

**COMMUNITY DEVELOPMENT/RESOURCE AGENCY
ENVIRONMENTAL COORDINATION SERVICES**
County of Placer

NOTICE OF AVAILABILITY OF A FINAL ENVIRONMENTAL IMPACT REPORT
(Public Resources Code Section 21092.5)

Notice is hereby given on July 9, 2021 that Placer County released a Final Environmental Impact Report (Final EIR) for the following project.

PROJECT NAME: Housing-Related Code Amendments (PLN18-00320), State Clearinghouse No. 2019080460

PROJECT DESCRIPTION: The County of Placer has prepared an environmental impact report (EIR) that addresses the potential impacts of the Proposed Housing-Related Code Amendments. The project consists of targeted amendments to the Placer County General Plan, Placer County Zoning Ordinance, Zoning Maps, and Community Design Guidelines Manual, providing a framework for future housing development in Placer County that takes into account population growth, economic factors, demographics, and community needs and wants.

PROJECT LOCATION: County-wide

PUBLIC MEETING: The Planning Commission will consider its recommendation to the Board of Supervisors at the following public meeting:

- July 22, 2021 at 10:30 a.m. – Placer County Planning Commission, 3091 County Center Drive, Auburn, California.

The Placer County Planning Commission meeting will begin at 10:00 a.m.; however, the proposed project is will be considered at 10:30 a.m. or as soon thereafter as possible. Please refer to the meeting agendas at the following link up to 1 week prior to the meetings for updated information:

<https://www.placer.ca.gov/AgendaCenter/Planning-Commission-53>

The Final EIR consists of (1) Revisions to the Draft EIR text, (2) Comments received during the public comment period on the Draft EIR and responses thereto, and (3) A Mitigation Monitoring Reporting Program.

The Final EIR is now available at the following locations:

- Community Development Resource Center public counter, 3091 County Center Drive, Auburn
- Placer County Administrative Offices-Tahoe public counter, 775 North Lake Boulevard, Tahoe City
- Placer County Clerk-Recorder's Office, 2954 Richardson Drive, Auburn

An electronic copy of the Final EIR is available online at the Placer County website:

<https://ca-placercounty.civicplus.com/5925/Housing-Related-Code-Amendments>

For further information, please contact:

Community Development Resource Agency, Environmental Coordination Services
3091 County Center Drive, Suite 190
Auburn, CA 95603
email: cdraecs@placer.ca.gov / fax: 530-745-3080 / phone: 530-745-3000

Proposed Housing-Related Code Amendments Final Environmental Impact Report

COUNTY OF PLACER

SCH# 2019080460



Prepared by ICF



MAY 2021

PROPOSED HOUSING-RELATED CODE AMENDMENTS FINAL ENVIRONMENTAL IMPACT REPORT

PREPARED FOR:

County of Placer
3091 County Center Drive, Suite 280
Auburn, CA 95603
Contact: Shawna Purvines
530-754-3031

PREPARED BY:

ICF
980 9th Street
Sacramento, CA 95814
Contact: Sally Zeff
916-231-9543

May 2021



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2-1 Agencies, Organizations, and Persons Commenting on the Draft EIR

Acronyms and Abbreviations

CEQA	California Environmental Quality Act
County	Placer County
Final EIR	Final Environmental Impact Report
General Plan	Placer County General Plan
NOP	Notice of Preparation
Zoning Ordinance	Placer County Zoning Ordinance

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This is the Final Environmental Impact Report (Final EIR) for the Proposed Housing-Related Code Amendments. The proposed project consists of targeted amendments to the Placer County General Plan (General Plan), Placer County Zoning Ordinance (Zoning Ordinance), Zoning Combining Districts, and Community Design Manual for Multi-Family and Mixed-Use Development, which would provide a framework for future housing development in Placer County (County) that considers population growth, economic factors, demographics, and community needs and wants.

Purpose and Format of Final EIR

The purpose of the Final EIR is to provide County decision-makers and the public with information about the proposed project and its significant environmental impacts. The EIR identifies alternatives to the project that would result in lesser impacts. It also includes substantial mitigation measures that would reduce, but not completely avoid, the significant impacts identified in the Final EIR.

Technically, the Final EIR consists of two parts: this document and the Draft EIR that was circulated for public review. For simplicity, the document you are reading will be called the Final EIR. It contains three chapters: Chapter 1, Introduction; Chapter 2, Comments and Responses to Comments; and Chapter 3, Draft EIR Revisions. The Final EIR and accompanying Draft EIR will be available to the County Planning Commission and Board of Supervisors for consideration during their decision-making process to approve or deny the project.

Opportunities for Public Involvement

The County distributed a notice of preparation (NOP) beginning on August 28, 2019 advising public agencies that an EIR would be prepared for this project. The NOP was distributed for a 30-day comment period that ended September 27, 2019. The comments on the NOP were considered in the preparation of this EIR. In addition, as required by the California Environmental Quality Act (CEQA), the County held a Planning Commission meeting on February 11, 2021 at which members of the public and public agency representatives were given the opportunity to review preliminary project plans and offer their comments.

Contents and Organization of the Final EIR

The Final EIR is organized in three chapters.

- Chapter 1, *Introduction*, describes the intent of the final EIR, summarizes the opportunities for public involvement to date, and outlines the contents of the final EIR.
- Chapter 2, *Comments and Responses to Comments*, provides a list of, and includes the written comments of, all agencies, organizations, and individuals that commented on the draft EIR. Each comment letter is presented with brackets that divide it into individual comments. Each letter is

assigned a letter number and comment number. For example, comments in the first letter are numbers 1-1, 1-2, 1-3, and so on.

- Chapter 3, *Revisions to the Draft EIR*, contains changes made to the text of the Draft EIR in response to comments received during the public review period, or for purposes of clarification or correction. Changes to the Draft EIR text are shown by ~~striketrough~~ of text that has been deleted and **bold** text indicates new text that has been inserted. The revisions contain clarifications and corrections that have been identified, either through public comments or by the County, since publication of the Draft EIR. The text revisions do not result in substantive changes to either the analyses or conclusions presented in the Draft EIR.

In order to assist the reader, Chapter 3 identifies the location in the Draft EIR where each revision is being made, including the paragraph or paragraphs to which the revisions are being made to provide context of the revisions.

- Appendix A, *Final Mitigation Monitoring and Reporting Program*, indicates the mitigation measures to be incorporated by the County and specifies the implementation and monitoring responsibilities for each of those measures.

Minor Changes to the Proposed Project

Since the publication of the Draft EIR, the County has made minor revisions to the proposed project. These revisions are zoning ordinance language changes and primarily address three topic areas: (1) the definition of moveable tiny houses, (2) requiring PCCP consistency for Cluster Lot Development, and (3) eliminating changes to the zoning ordinance regarding which zones residential care facilities are allowed in, in favor of addressing residential care facilities and supportive housing comprehensively in the future, in response to changes in state law, which now requires supportive housing to be an allowed use by right in zones where multifamily and mixed uses are permitted.

These changes would not affect the conclusions of this EIR and would not require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5 for the reasons described in this section.

- Changes to the definition of moveable tiny houses would not allow development that would not be allowed under the proposed project. The changes would update the definition of Tiny House on Wheels to align with standards required by the State, update the description of the certifications required to allow registering with HCD, and add language to clarify that tiny homes used as ADUs are also subject to those regulations.
- Adding a requirement for consistency with the PCCP for Cluster Lot Development reflects existing County policy and regulations at this time. There would be no change in the impacts identified in this EIR.
- Removal of zoning ordinance changes related to residential care facilities from the project would not increase impacts identified in this EIR or require additional mitigation.

CEQA Process

The Draft EIR was made available for the public's review and comment for a period of 45 days, beginning January 21, 2021, and ending March 8, 2021. CEQA requires that before the County can take action to approve a project, it must complete and certify the adequacy of the Final EIR.

The Planning Commission hearing on the proposed project will include the Planning Commission's consideration of the Final EIR. The Final EIR was made available for public inspection a minimum of ten days before the scheduled date of the hearing.

The public can submit comments on the Final EIR prior to or during the Planning Commission hearing. Those comments will not be responded to in writing. However, they will be considered by the Planning Commission prior to making its decision on the proposed project.

If the project is approved, the County will adopt findings of fact describing how it will address the significant environmental impacts that will result from the project; a statement of overriding considerations describing the economic, legal, social, technological, or other benefits that the project would provide; and a mitigation monitoring or reporting program to ensure that the mitigation measures identified in the Final EIR will be implemented.

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Chapter 2

Comments and Responses

Introduction and Organization of this Chapter

This chapter contains the comments on the Draft EIR received by the County during the Draft EIR public review period and responses to those comments. A single letter or e-mail may contain several individual comments. Each letter and comment has been given a number, and the written responses identify which letter and comment or comments the response addresses.

Table 2-1 lists all the comment letters, in the order received, on the Draft EIR. The County's responses follow each letter or e-mail. The responses are well-considered, good faith responses to each comment that relates to an environmental issue. In those cases where a comment does not relate to an environmental issue, the response acknowledges the comment, and may also provide information about the County's actions related to the topic raised in the comment, if applicable. In some cases, revisions have been made to the FEIR for clarification purposes only. No new environmental impacts have been identified.

Table 2-1. Agencies, Organizations, and Persons Commenting on the Draft EIR

Letter Number	Commenter	Date
1	Gavin McCreary, Department of Toxic Substances Control	January 25, 2021
2	Placer County Airport Land Use Commission	February 24, 2021
3	Amber Beckler	March 8, 2021
4	Cheryl Berkema	March 8, 2021
5	Dave Cook, Cook Development	March 8, 2021
6	Defend Granite Bay	March 8, 2021
7	Sandra H. Harris	March 8, 2021
8	Sandra Harris	No Date
9	Central Valley Regional Water Quality Control Board	March 12, 2021
10 Transcript	Planning Commission Meeting Comments on DEIR	February 11, 2021

Comments Received and Responses

Letter 1. Gavin McCreary, Department of Toxic Substances Control, dated January 5, 2021



Letter #1

January 25, 2021

Ms. Shirlee Herrington
County of Placer
3091 County Center Drive, Suite 280
Auburn, CA 95603
SHerring@placer.ca.gov

DRAFT ENVIRONMENTAL IMPACT REPORT FOR PROPOSED HOUSING-RELATED
CODE AMENDMENTS – DATED DECEMBER 2020 (STATE CLEARINGHOUSE
NUMBER: 2019080460)

Ms. Herrington:

The Department of Toxic Substances Control (DTSC) received a Draft Environmental Impact Report (EIR) for Proposed Housing-Related Code Amendments (Project). The Lead Agency is receiving this notice from DTSC because the Project includes one or more of the following: groundbreaking activities, work in close proximity to a roadway, work in close proximity to mining or suspected mining or former mining activities, presence of site buildings that may require demolition or modifications, importation of backfill soil, and/or work on or in close proximity to an agricultural or former agricultural site.

1-1

DTSC recommends that the following issues be evaluated in the EIR Hazards and Hazardous Materials section:

1. The EIR should acknowledge the potential for historic or future activities on or near the project site to result in the release of hazardous wastes/substances on the project site. In instances in which releases have occurred or may occur, further studies should be carried out to delineate the nature and extent of the contamination, and the potential threat to public health and/or the environment should be evaluated. The EIR should also identify the mechanism(s) to initiate any required investigation and/or remediation and the government agency who will be responsible for providing appropriate regulatory oversight.
2. Refiners in the United States started adding lead compounds to gasoline in the 1920s in order to boost octane levels and improve engine performance. This practice did not officially end until 1992 when lead was banned as a fuel additive in California. Tailpipe emissions from automobiles using leaded gasoline

1-2

1-3

Ms. Shirlee Herrington
January 25, 2021
Page 2

contained lead and resulted in aerially deposited lead (ADL) being deposited in and along roadways throughout the state. ADL-contaminated soils still exist along roadsides and medians and can also be found underneath some existing road surfaces due to past construction activities. Due to the potential for ADL-contaminated soil DTSC, recommends collecting soil samples for lead analysis prior to performing any intrusive activities for the project described in the EIR.	1-3 cont.
3. If any sites within the project area or sites located within the vicinity of the project have been used or are suspected of having been used for mining activities, proper investigation for mine waste should be discussed in the EIR. DTSC recommends that any project sites with current and/or former mining operations onsite or in the project site area should be evaluated for mine waste according to DTSC's 1998 Abandoned Mine Land Mines Preliminary Assessment Handbook (https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/11/aml_handbook.pdf).	1-4
4. If buildings or other structures are to be demolished on any project sites included in the proposed project, surveys should be conducted for the presence of lead-based paints or products, mercury, asbestos containing materials, and polychlorinated biphenyl caulk. Removal, demolition and disposal of any of the above-mentioned chemicals should be conducted in compliance with California environmental regulations and policies. In addition, sampling near current and/or former buildings should be conducted in accordance with DTSC's 2006 <i>Interim Guidance Evaluation of School Sites with Potential Contamination from Lead Based Paint, Termiticides, and Electrical Transformers</i> (https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/Guidance_Lead_Contamination_050118.pdf).	1-5
5. If any projects initiated as part of the proposed project require the importation of soil to backfill any excavated areas, proper sampling should be conducted to ensure that the imported soil is free of contamination. DTSC recommends the imported materials be characterized according to DTSC's 2001 <i>Information Advisory Clean Imported Fill Material</i> (https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/SMP_FS_Cleanfill-Schools.pdf).	1-6
6. If any sites included as part of the proposed project have been used for agricultural, weed abatement or related activities, proper investigation for organochlorinated pesticides should be discussed in the EIR. DTSC recommends the current and former agricultural lands be evaluated in accordance with DTSC's 2008 <i>Interim Guidance for Sampling Agricultural Properties (Third Revision)</i> (https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/Ag-Guidance-Rev-3-August-7-2008-2.pdf).	1-7
DTSC appreciates the opportunity to comment on the EIR. Should you need any assistance with an environmental investigation, please submit a request for Lead Agency Oversight Application, which can be found at: https://dtsc.ca.gov/wp-content/uploads/sites/31/2018/09/Lead_Agency_Oversight_Application.pdf	

Ms. Shirlee Herrington
January 25, 2021
Page 3

[content/uploads/sites/31/2018/09/VCP_App-1460.doc](#). Additional information regarding voluntary agreements with DTSC can be found at: <https://dtsc.ca.gov/brownfields/>.

If you have any questions, please contact me at (916) 255-3710 or via email at Gavin.McCreary@dtsc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Gavin McCreary". The signature is fluid and cursive, with the first name "Gavin" being more prominent than the last name "McCreary".

Gavin McCreary
Project Manager
Site Evaluation and Remediation Unit
Site Mitigation and Restoration Program
Department of Toxic Substances Control

cc: (via email)

Governor's Office of Planning and Research
State Clearinghouse
State.Clearinghouse@opr.ca.gov

Mr. Dave Kereazis
Office of Planning & Environmental Analysis
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

Responses to Comment Letter 1 – Gavin McCreary, Department of Toxic Substances Control

Response to Comment 1-1

Although the project does not propose any site-specific development, it would allow for new dwelling units that could be developed through implementation of the project. Future development would still be required to comply with all relevant laws and regulations, including any pertaining to the hazards and hazardous conditions described.

Response to Comment 1-2

Section 3.9, *Hazards and Hazardous Materials*, details the potential for encountering contaminated sites. Starting on page 3.9-7, the Draft EIR identifies and describes Cortese sites located in the areas slated for new development. All future projects would be required to be consistent with Policy 8.G.2 of the County General Plan, which discourages development near known hazardous waste sites or facilities. The project would not change existing provisions regarding hazardous material sites, and any development occurring through implementation of the project would be required to complete site specific California Environmental Quality Act (CEQA) review. This review would include identification of hazardous sites and necessary investigations, remediation, and oversight, if needed.

Response to Comment 1-3

Future development occurring through implementation of the project would be required to complete a separate environmental review process to ensure proper identification of site hazards and hazardous materials, including the potential for aerially deposited lead (ADL).

Response to Comment 1-4

Future development occurring through implementation of the project would be required to complete a separate environmental review process. This process would identify any mining sites nearby and recommend treatment and remediation if necessary.

Response to Comment 1-5

Future development occurring through implementation of the project would be required to complete a separate environmental review process. This process would identify lead-based paint, asbestos-containing materials, and other hazardous building components. Development projects would comply with applicable laws and regulations regarding these materials.

Response to Comment 1-6

Future development occurring through implementation of the project would comply with all applicable laws and regulations pertaining to imported soil, including characterizing soils according to DTSC's 2001 Information Advisory Clean Imported Fill Material.

Response to Comment 1-7

Future development occurring through implementation of the project would be required to complete a separate environmental review process, which would identify any sites that required testing and/or remediation for pesticides.

Letter 2. Michael Luken, Placer County Airport Land Use Commission, dated February 24, 2021

Letter #2



February 24, 2021

Shirlee Herrington
 Environmental Coordination Services
 Placer County Community Development Resources Agency
 3091 County Center Drive, Suite 190
 Auburn, CA 95603

SANDY AMARA
 City of Auburn
 TRINITY BURRUSS
 City of Colfax
 PAUL JOINER
 City of Lincoln
 BRIAN BAKER
 Town of Loomis
 KEN BROADWAY
 City of Rocklin
 JOHN ALLARD
 City of Roseville
 JIM HOLMES
 KIRK UHLER
 Placer County
 DAN WILKINS
 Citizen Representative
 MIKE LUKEN
 Executive Director

Re: Draft Environmental Impact Report for the Proposed Placer County Housing Related Code Amendments

Dear Ms. Herrington:

Thank you for the opportunity to provide input on the Draft Environmental Impact Report (DEIR) for Placer County's proposed Housing Related Code Amendments.

Placer County is proposing to amend Placer County's General Plan Land Use Element for High Density Residential and General Commercial clarifying the allowance of mixed use/multifamily uses in these land use designations. In addition, several Zoning Ordinance amendments are similarly proposed that would allow multifamily development by right in a number of commercial zones and the new Mixed Use zone subject to new design standards and guidelines; increase the allowable density of mobile home parks; allow additional workforce housing; update various development standards and the review for by-right development process; update the Density Bonus Ordinance; allow for cluster housing; and incorporate various amendments to the County's zoning map. Because these changes amend the General Plan and Zoning Ordinance, they will require the Airport Land Use Commission to complete a consistency determination with the Placer County Airport Land Use Compatibility Plan prior to their approval by the County Board of Supervisors.

2-1

Please coordinate with David Melko of my staff, at 530.823.4090 or at dmelko@pctpa.net, to schedule the ALUC review of the proposed Housing Related Code Amendments. Thank you.

Sincerely,

A blue ink signature of Michael Luken, written in a cursive style.

Michael Luken
 Executive Director

c: Steve Pedretti, Placer County
 E.J. Ivaldi, Placer County
 Shawna Purvines, Placer County
 Karen Schwab, Placer County
 Alex Fisch, Placer County
 Patrick Dobbs, Placer County
 Bob Fiore, Caltrans Division of Aeronautics Office of Aviation Planning
 Maranda Thompson, Mead and Hunt

299 Nevada Street • Auburn, CA 95603 • (530) 823-4030 (tel/fax)

Responses to Comment Letter 2 – Gavin McCreary, Department of Toxic Substances Control

Response to Comment 2-1

A consistency determination will be considered through the Placer County Transportation Planning Agency on April 28, 2021.

Letter 3. Amber Beckler, dated January 5, 2021

Letter #3

Shirlee Herrington

From: Amber Beckler <zagnut@hotmail.com>
Sent: Monday, March 8, 2021 1:29 PM
To: Placer County Environmental Coordination Services
Cc: Defend Granite Bay; gbca@granitebay.com; Suzanne Jones; Michael Spelis
Subject: [EXTERNAL] Public Comment: Draft EIR - Housing Related Code Amendments (PLN18-00320) State Clearinghouse No. 2019080460

Hello,

Thank you for the opportunity to provide public comment. As part of the housing related code amendment, I have 5 requests and clarifications:

- | | |
|--|-----|
| 1. Recommendation: Amend the Zoning code/text for Residential Care definition of 7 or more to meet Department of Health and Social Services guidelines and restrict that use to not be allowed in Res-Ag zoning. This would bring District 4 in to landuse consistency with the City of Roseville and align to meet state guidelines which is the goal of this update. This is currently being abused in Granite Bay with recent projects (eg. Catuna, Eureka Residences, Ovation). | 3-1 |
| 2. Recommendation: I also wish to further quality where cluster housing can be used and further qualify this text update. Cluster housing should be restricted to medium to high density and commercial landuse designations and should be used for affordable housing which is near transit areas and follow context sensitive design (thus reducing impact to natural features). | 3-2 |
| 3. Clarification: For the impacts listed for biological resources (special status plant and wildlife species), riparian, oak woodland habitat, waters, cultural, water quality, drainage impacts- it is unclear how these mitigation measures are different than what is currently in place for impacted biological and other resources listed. What has specifically changed with the mitigation and monitoring program in this housing code amendment? Is there a different process than for other development? | 3-3 |
| 4. Clarification: Please provide definition of an "invasive weed" in your landscape design guideline. Is this any non-endemic to CA or non-native to the locale in question? Or a broad reference to "weedy" species that spread. | 3-4 |
| 5. Recommendation: The Placer County Landscape Design Guidelines should be amended for the existing landscape design guidelines if not already included to include "native" plantings vs exotics or ornamental in landscapes. | 3-5 |

I look forward to the integration of this feedback and responses as I have seen #1 included in multiple other public comment letters for the NOP but it appears it did not make it into the EIR and your proposed changes.	3-6
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Sincerely,

Amber Beckler
 Granite Bay, CA

530-210-3787

6.

Responses to Comment Letter 3 – Amber Beckler

Response to Comment 3-1

In this comment, the commenter describes a change to the project supported by the commenter. This comment is not directed at the environmental analysis and is being referred to the decisionmakers for their consideration during their decision-making process. Please see also the response to Comment 6-1.

Response to Comment 3-2

In this comment, the commenter describes a change to the proposed project supported by the commenter. This comment is not directed at the environmental analysis and is being referred to the decisionmakers for their consideration during their decision-making process. Please see also the response to Comment 6-3.

Response to Comment 3-3

To the extent that mitigation measures required for this project are not currently required, these would be new requirements. The Mitigation Monitoring and Reporting Program (MMRP), which will be considered for adoption at the time the project is approved, describes how the County will ensure implementation of the mitigation measures. The Draft MMRP can be reviewed on-line on the Environmental Coordination Services page on the county website: <https://www.placer.ca.gov/2479/Environmental-Coordination-Services> or at the CDRA front desk.

Response to Comment 3-4

The following definition is found on page 52 of the Placer County Landscape Design Guidelines:

“Invasive Plant Species” means species of plants not historically found in California that spread outside cultivated areas and can damage environmental or economic resources. Invasive species may be regulated by county agricultural agencies as noxious species. Lists of invasive plants are maintained at the California Invasive Plant Inventory and USDA invasive and noxious weeds database.

Response to Comment 3-5

In this comment, the commenter describes a change to the proposed project supported by the commenter. This comment is not directed at the environmental analysis. The Placer County Landscape Design Guidelines do already include recommendations for the use of native plants in a number of places in the Design Guidelines.

Response to Comment 3-6

This Response to Comments document is a part of the Final EIR, and all comments and responses are being incorporated into the EIR. However, comments that request changes to the project, as noted above, are being referred to the decisionmakers for their consideration during their decision-making process.

Letter 4. Cheryl Berkema, dated March 8, 2021

Letter #4

Shirlee Herrington

From: Cheryl Berkema <cheryl.berkema@gmail.com>
Sent: Monday, March 8, 2021 4:59 PM
To: Shirlee Herrington
Subject: [EXTERNAL] Public comment Housing Code Amendment EIR

CDRA,

Subject: housing related code amendment EIR feedback

My Executive level summary feedback on the inappropriateness of the Code Amendment EIR at this time without State feedback on the Housing Element Update

From a process standpoint, this document is a tactical execution document. CDRA's introduction of this document is the cart leading the horse. The Placer County General Plan Housing Element Update is the parent document that would drive implementation details such as the strategic plan for the future housing element (2021-2029), fees for housing and code amendments. The Housing Element Update (which includes a performance component for the current Housing Element 21013-2021) and state feedback on the Housing Element Update has not been provided to the Planning Commission or to the public. Clearly the performance of the previous Housing Element and a retrospective feedback should be a prerequisite to future strategic vision, fee determination, and technical code amendment detail.

4-1

1. It is troublesome that CDRA with poor performance of the housing element (D's and F's as reported by an independent source) has executed technical details such as fees and this drafty document EIR without the state's feedback. The lack of regular factual performance were owed by

4-2

CDRA. The poor performance didn't happen in a year.

<https://www.ocregister.com/2019/12/09/housing-permit-report-card-how-we-graded-every-city-county-in-california/>

2. The Board of Supervisors just passed a resolution for workforce housing with the intent of launching a plan that will siphon millions from the General Fund for multiple years for 40 units a year in Tahoe and 10 units in Western Placer County. This is clearly a reactionary and remediation activity based upon CDRA's poor performance with workforce housing. Why should taxpayers pick up the tab?

4-3

3. The pattern of practice appears to be that developers are in charge of the county not the Board of Supervisors. CDRA in their housing element update states that the updates are designed to reflect recently approved specific plans. Should this not read that specific plans abide by county goals and policies? To date, CDRA has failed miserably in constructing affordable housing. Rezone after rezone extends the life times of vested tentative maps depriving us application fees and reimbursement for EIR's; VERY similar to the issues experienced in Lincoln which required a loan by Placer County to remedy. This EIR should be introduced after State feedback, unusually low fees should be reevaluated, and the strategic objectives reevaluated. Restitution of the recent developer extensions without adequate workforce and affordable housing should be accomplished.

4-4

- | | |
|---|-----|
| 4. The Appendices to this EIR were developed in 2019 which indicates a “predisposition” by CDRA in the execution details. The approvals of extensions and low fees indicate predisposition by CDRA. | 4-5 |
|---|-----|

Placer County General Plan Housing Element Recommendations:

- | | |
|---|------|
| 1. Amend the Zoning code/text for Residential Care definition of 7 or more to meet Department of Health and Social Services guidelines and restrict that use to not be allowed in Res-Ag zoning. This would bring District 4 in to land use consistency with the City of Roseville and align to meet state guidelines which is the goal of this update. This is currently being abused in Granite Bay with recent projects (eg. Catuna, Placer Residences, Ovation). | 4-6 |
| 2. Cluster housing should be restricted to medium to high density and commercial land use designations and should be used for affordable housing which is near transit areas and follow context sensitive design (thus reducing impact to natural features). | 4-7 |
| 3. Remove all “loophole language. Code amendments need specific independently reviewed and testable, and enforceable language. As determined by planning or on a case by case basis is not testable and enforceable. | 4-8 |
| 4. Placer County has abused AIR Quality in Placer County approving projects so egregious that out of state credits needed to be purchased to mitigate projects. The Air Quality Control Board was recently audited stating that the Governor’s mandate would not be met. Entitling developers by approving ~ 600,000 vehicle trips a day and then penalizing residents/taxpayers by putting restrictions on gas stoves is ludicrous. Approving projects that are allowed to pollute in an already top 10 worst air quality in the United States is not responsible. | 4-9 |
| 5. At the The Granite Bay March 2021 MAC there were requests to review PDs, overlay maps and how Community Plan would be impacted. When this code amendment was presented to the MAC originally, it was stated that the tables were confusing and that it was not ready for prime time. The expectation was that this project would be brought back to the MAC. This code amendment project is out of sequence in the process and being rushed. | 4-10 |
| 6. All new zones should have for affordable housing as a qualifier with the current dollar definitions for very low, low, and moderate housin. | 4-11 |
| 7. Commercial properties should have a workforce housing requirement. | 4-12 |
| 8. Water should be a component of evaluated requisite infrastructure. PCWA is a first come first serve “will Serve”. Please pay attention to El Dorado County hours from running out of water. | 4-13 |

It is time that CDRA listens to public feedback. Thank you for your consideration.

Sincerely,
Cheryl Berkema
Granite Bay, CA
916 797-1730

Responses to Comment Letter 4 – Cheryl Berkema

Response to Comment 4-1

The Housing Element Update is a separate planning project, and has been presented to the Planning Commission at meetings where that project is on the agenda. More information about the Housing Element Update and the schedule for hearings and adoption of the updated element can be found on the County's website at <https://www.placer.ca.gov/6624/2021-Housing-Element-Update>.

Response to Comment 4-2

This comment presents the commenter's opinion regarding the County's performance regarding the Housing Element. As noted in the response to Comment 4-1, the Housing Element Update is a separate planning project. This comment is not directed at the environmental analysis and is being referred to the decisionmakers for their consideration during their decision-making process.

Response to Comment 4-3

This comment appears to concern the content of the Housing Element and other actions already taken by the County, and presents the commenter's opinion regarding these actions. As noted in the response to Comment 4-1, the Housing Element Update is a separate planning project. Additionally, the EIR analyzes only the actions proposed by the project; the County's prior actions regarding workforce housing are not analyzed. This comment is not directed at the environmental analysis and is being referred to the decisionmakers for their consideration during their decision-making process.

Response to Comment 4-4

This comment appears to present the commenter's opinions regarding the content of the Housing Element update. As noted in the response to Comment 4-1, the Housing Element Update is a separate planning project. This comment is not directed at the environmental analysis and is being referred to the decisionmakers for their consideration during their decision-making process.

Response to Comment 4-5

The commenter states their opinion about the EIR appendices being developed in 2019, indicating what the commenter calls a "predisposition." It is not entirely clear what the commenter's concern is regarding the EIR. The Notice of Preparation (NOP) of the EIR was issued in August 2019. The County worked on the EIR following the close of the NOP comment period and issued the Draft EIR in late 2020. It is not uncommon for preparation of an EIR to take a year or longer, and 2020 was a year filled with challenges. The project analyzed in the EIR is proposed by the County, but the decision on whether or not to approve it lies with the Planning Commission and Board of Supervisors.

Response to Comment 4-6

This comment is similar to Comment 3-1. As noted in the response to Comment 3-1, in this comment, the commenter describes a change to the project supported by the commenter. This comment is not directed at the environmental analysis and is being referred to the decisionmakers for their consideration during their decision-making process. Please see also the response to Comment 6-1.

Response to Comment 4-7

This comment is similar to Comment 3-2. As noted in the response to Comment 3-2, in this comment, the commenter describes a change to the project supported by the commenter. This comment is not directed at the environmental analysis and is being referred to the decisionmakers for their consideration during their decision-making process. Please see also the response to Comment 6-3.

Response to Comment 4-8

In this comment, the commenter describes a change to the project supported by the commenter. This comment is not directed at the environmental analysis and is being referred to the decisionmakers for their consideration during their decision-making process. Please see also the response to Comment 6-1.

Response to Comment 4-9

Existing air quality in the County and the impacts of the project on air quality are presented in Section 3.3 of the EIR. Federal and state attainment status for Placer County is shown in Table 3.3-3.

Mitigation Measure AQ-2, to which the commenter appears to refer, would restrict future residential construction associated with the project only. It would not apply to existing residences.

Response to Comment 4-10

Since the time this comment was written, the project was brought back to the Granite Bay MAC for discussion on April 7, 2021.

Response to Comment 4-11

In this comment, the commenter describes a change to the project supported by the commenter. This comment is not directed at the environmental analysis and is being referred to the decisionmakers for their consideration during their decision-making process.

Response to Comment 4-12

In this comment, the commenter describes a change to the proposed project supported by the commenter. This comment is not directed at the environmental analysis and is being referred to the decisionmakers for their consideration during their decision-making process.

Response to Comment 4-13

General Plan policies regarding the provision of water for new construction are presented on page 3.15-5 of the Draft EIR. For example, Policy 4.C.1 requires: "The County shall require proponents of new development to demonstrate the availability of a long-term, reliable water supply. The County shall require written certification from the service provider that either existing services are available or needed improvements will be made prior to occupancy. Where the County will approve groundwater as the domestic water source, test wells, appropriate testing, and/or report(s) from qualified professionals will be required substantiating the long-term availability of suitable groundwater."

Letter 5. Dave Cook, Cook Development, dated March 8, 2021

Letter #5

Shirlee Herrington

From: Dave Cook <dave@cookdevelopment.us>
Sent: Monday, March 8, 2021 7:56 AM
To: Shawna Purvines; Patrick Dobbs
Cc: Christopher Schmidt; EJ Ivaldi; Shirlee Herrington; Jason Cole
Subject: [EXTERNAL] Requested ZTA language: (-B, -DL)
Attachments: 17.52.060 Density Limitation (-DL) Proposed Revisions 3.07.21.docx; 17.52.040 Building Site (-B) Proposed Revisions 3.07.21.docx

Good morning, Shawna and Patrick,

Attached are two Word documents marked to show proposed/requested changes to PCC 17.52.040 Building Site (-B) and 17.42.060 Density Limitation (-DL) in an effort to ensure that the alley-loaded product is accommodated. We have also offered some proposed setback clarifications and hope that you will be able to include these revisions with the other modifications being contemplated and evaluated in the current DEIR.

Our recent focus has been to incorporate a broader range of designs in residential communities to help ensure greater affordability and architectural variety. One of the keys to this, and a primary opportunity for incorporating ADUs over the garages, is the alley-loaded product. However, as currently written, the County's development standards don't allow for this opportunity without variances.

Working with our land planner we looked at AL product in Folsom and Roseville, and evaluated the various lot and product configurations for those neighborhoods where the resulting product and non-garage dominated elevations were deemed appropriate and most attractive. This product needs to be incorporated in the right settings with proper design consideration, but we believe the County needs to continue to move in this direction in order to provide more attainable housing.

Please let me know if you have any questions or would like examples of some those communities we evaluated. We appreciate the opportunity to provide these requested modifications and hope that they can be incorporated with the other changes being considered.

Thank you,



Dave Cook
916.764.4321

COOK DEVELOPMENT
Consulting Services, LLC
www.cookdevelopment.us

5-1

17.52.040 Building site (-B).

C. Combining District Requirements. The requirements and standards that apply to land uses within the -B combining district shall be the same as otherwise required by Sections 17.06.060 et seq., for the applicable zone with which the -B district is combined, except as follows:

1. Minimum Lot Area, Setbacks, and Lot Width. Within the building site combining district, minimum lot area, minimum setbacks, and minimum lot width shall be as follows:

District	Minimum Lot Area (sq. ft.)	Front (4)	Minimum Setbacks (feet) (5) (1) (3)			Minimum Lot Width (feet) (5)	
			Street-side (4)	Side (2) (4)	Rear	Corner Lot	Interior Lot
B-3	3,000	(3) 12.5	<u>10</u>	(4) 5	(2) 10	40	35
B-4	4,000	(3) 12.5	<u>10</u>	(4) 5	(2) 10	50	45
B-6	6,000	(3) 12.5	<u>10</u>	(4) 5	(2) 10	55	50
B-8	8,000	(3) 12.5	<u>10</u>	(4) 5	(2) 10	60	55
B-10	10,000	25-20	<u>10</u>	40 15/5	(2) 10	65	55
B-20	20,000	35	<u>15</u>	15	(2) 15	100	100
B-40	40,000	50	<u>20</u>	20	(2) 20	135	135
B-43	43,560	50	<u>30</u>	30	30	135	135
B-100	100,000	50	<u>30</u>	30	30	160	160
B-X		As shown on Zoning Map Minimum Parcel Size and/or if applicable, Special Setbacks per GPA or REA					

(1) Additional requirements for setbacks from watercourses and all roads identified in the highway deficiency report and countywide capital improvement program, setbacks between structures, on the same site, and setbacks in other situations are established by Section 17.54.140 (Exceptions to front, street-side, side and rear setbacks) and Article 17.56 for certain specific land uses. NOTE: Different setbacks may apply if the RS zone district is combined with other zone districts in this chapter (i.e., -B, -DL, -DR, -PD, etc.) Where any road has a right of way less than fifty (50) feet in width, add twenty five (25) feet to the front setback requirement, measured from the center of the traveled way.

(2) setbacks are as specified by the base zone district.

(3) Front setbacks shall be twelve and one half (12½) feet for any portion of a structure; however, no less than twenty (20) feet to the face (vehicle entrance) of any garage or carport.

a) Architectural features, such as but not limited to cornices, eaves, canopies, fireplaces, and similar features, but not any flat wall or addition creating living space, may encroach up to two feet into any required setback.

b) Covered, unenclosed projections attached to the primary structure may encroach up to six (6) feet into any front yard setback.

c) Front setback (and side setback where adjacent to street) measured from back of walk. Fence side yard setback is five feet from back of walk where facing a street. In the absence of sidewalk, setbacks measured from the edge of right-of-way.

(2) Side setbacks shall be minimum five feet—one story; minimum seven and one-half (7 ½) feet—two or more stories, except for "alley loaded" product which shall be five (5) feet for one or two stories.

(3) Or outside of a minimum twelve and one half (12.5) foot multi-purpose easement or public utility easement that is adjacent to any public roadways, streets, or driveways and no less than twenty (20) feet to the face (vehicle entrance) of any garage or carport.

(4) If the parcel is one acre or greater in gross area, the setbacks shall be As required by the California Board of Forestry Fire Safe Regulations (§ 1276.01, Title 14, California Code of Regulations) if lot is one acre or larger in size.

2. Maximum Building Height. Thirty (30) feet on lots of less than twenty thousand (20,000) square feet; thirty-six (36) feet on lots that are twenty thousand (20,000) square feet or larger. Architectural features, mechanical equipment, chimneys, vents, and other architectural or mechanical appurtenances on buildings may be a maximum of 15 percent higher than the height limit of the applicable zone.

NOTE: An increase in height of not more than five feet, or ten (10) percent may be granted per Section 17.60.105(A)(3). Exception: This does not apply to the Tahoe Basin (North Tahoe, West Shore and Tahoe City). Refer to Section 17.04.030, definition of building height (Table with Maximum Heights for Buildings – Tahoe) or conditions of approval for a subdivision – Use Figure 17.04.030-2B and Table 40-1 found in the definition of “building height” and Tahoe Regional Planning Agency (TRPA) Codes.

3. Maximum Lot Coverage. The maximum lot coverage permitted on any lot designated with a -B combining district shall be as specified by the base zone district, except that wherever a -B combining district is applied providing for lots of eight thousand (8,000) square feet minimum or less, the maximum lot coverage shall be forty (40) percent for two-story homes and fifty (50) percent for single-story homes. This limitation is not applicable to homes which include an accessory dwelling unit (ADU) or Junior Accessory Dwelling Unit (JADU) (Ord. 5126-B, 2001). **Exceptions: a) Maximum coverage in the Tahoe Basin (Tahoe Basin Area Plan) is regulated by Tahoe Regional Planning Agency (TRPA) ordinances; b) Maximum coverage for “alley-loaded” product in the B-3 and B-4 districts is not expressed as a percentage, but is a function of lot size, required setbacks and useable open space.**

(5). The minimum lot width for “alley-loaded” product shall be thirty (30) feet in the B-3 district (thirty-five (35) feet on corners) and thirty-five (35) feet in the B-4 district (forty (40) feet on corners).

17.52.060 Density limitation (-DL).

4. Site Coverage, Setbacks and Lot Width Requirements. The maximum site coverage (see Section 17.04.030 for definition) and the minimum setbacks and lot widths for parcels within a -DL combining district shall be as established by the following table for the -DL factors listed.

-DL Factor	Site Coverage (square feet)	Front (2)	Setbacks (feet) (5) (1) (3)			Lot Width (feet) (4)	
			Street-side (2)	Side (2)	Rear	Corner	Interior
4	(1) <u>40%</u>	(1) <u>20</u>	<u>10</u>	(1) <u>15/5</u>	(1) <u>10</u>	70	65 <u>55</u>
5	50/40% (2)	(3) <u>12.5</u>	<u>10</u>	(3) <u>15/5</u>	(1) <u>10</u>	60	55
6	50/40% (2)	(3) <u>12.5</u>	<u>10</u>	(3) <u>15/5</u>	(1) <u>10</u>	60	55 <u>50</u>
7	50/40% (2) (5)	(3) <u>12.5</u>	<u>10</u>	(3) <u>15/5</u>	(1) <u>10</u>	60	55 <u>50</u>
8	50/40% (2) (5)	(3) <u>12.5</u>	<u>10</u>	(3) <u>15/5</u>	(1) <u>10</u>	50	45
9	70% (5)	(4) <u>12.5</u>	<u>10</u>	(4) <u>5/5</u>	(4) <u>10</u>	50	45 <u>35</u>
10 or greater	70% (5)	(4) <u>12.5</u>	<u>10</u>	(4) <u>5/5</u>	(4) <u>10</u>	40	35

(1) ~~These standards are those specified in the base zone with which the -DL district is combined.~~ Additional requirements for setbacks from watercourses and all roads identified in the highway deficiency report and countywide capital improvement program, setbacks between structures on the same site, and setbacks in other situations are established by Section 17.54.140 (Exceptions to front, street-side, side and rear setbacks) and Article 17.56 for certain specific land uses.

a) Architectural features, such as but not limited to cornices, eaves, canopies, fireplaces, and similar features, but not any flat wall or addition creating living space, may encroach up to two feet into any required setback.

b) Covered, unenclosed projections attached to the primary structure may encroach up to six (6) feet into any front yard setback.

c) Front setback (and side setback where adjacent to street) measured from back of walk. Fence side yard setback is five feet from back of walk where facing a street. In the absence of sidewalk, setbacks measured from the edge of right-of-way.

(2) ~~Fifty (50) percent maximum coverage for one-story structures; forty (40) percent maximum coverage for structures with two or more stories.~~ The front and street-side setbacks shall be a minimum of twelve and one half (12.5) feet for any portion of a structure, but no less than twenty (20) feet to the face (vehicle entrance) of any garage or carport and outside of a minimum twelve and one half (12.5) foot multi-purpose easement or public utility easement that is adjacent to any public roadways, streets or driveways. The side setbacks shall be a total of fifteen (15) feet, minimum five feet to any structure for both sides. NOTE: For "alley-loaded" product the side setbacks shall be five (5) feet to any structure for both sides and for DL-9 and DL-10 the minimum setback to a garage door shall be five (5) feet. Where there is only one side (as on a corner lot), a street-side setback of ten (10) feet minimum shall apply.

~~(3) The front setback shall be a minimum of twelve and one-half (12½) feet for any portion of a structure, but no less than twenty (20) feet to the face (vehicle entrance) of any garage or carport. The side setbacks shall be a minimum of five feet to any single-story structure and a minimum of seven and one-half feet to any structure which is two stories or higher.~~

~~(4) The front and side building setbacks shall be the same as those noted in footnote (3) above, except that if an alley exists to the side or rear of a parcel, the minimum setback shall be thirty (30) feet from the centerline of the alley. The rear setback shall be 10 feet.~~

(3) If the parcel is greater than one acre in gross area, the setbacks shall be As required by the Calif. Board of Forestry Fire Safe Regulations (Section 1276.01, Title 14, California Code of Regulations), if lot is one acre or larger in size.

(4) The minimum lot widths for "alley-loaded" product shall be as follows:

a) DL-7: forty-five (45) feet

b) DL-8: forty (40) feet

c) DL-9: thirty-five (35) feet

d) DL-10: thirty (30) feet

Note: corner lots shall be five (5) feet wider than each of the above

(5) The maximum site coverage for "alley-loaded" product for DL-7 to DL-10 or greater is not expressed as a percentage, but is a function of lot size, required setbacks and useable open space.

(6) Maximum Building Height. Thirty (30) feet on lots of less than twenty thousand (20,000) square feet; thirty-six (36) feet on lots that are twenty thousand (20,000) square feet or larger. Architectural features, mechanical equipment, chimneys, vents, and other architectural or mechanical appurtenances on buildings may be a maximum of 15 percent higher than the height limit of the applicable zone.

Responses to Comment Letter 5 – Dave Cook, Cook Development

Response to Comment 5-1

In this comment, the commenter describes a change to the project supported by the commenter. This comment is not directed at the environmental analysis and is being referred to the decisionmakers for their consideration during their decision-making process.

Letter 6. Defend Granite Bay, dated March 8, 2021

Letter #6

Shirlee Herrington

From: Defend Granite Bay - A Community Association <defendgb@gmail.com>
Sent: Monday, March 8, 2021 4:18 PM
To: Placer County Environmental Coordination Services
Cc: GBCA; Alliance For Environmental Leadership
Subject: [EXTERNAL]
Attachments: Hanson_Bridgett_Senior_Care_Defintion.pdf

In addition to comments previously submitted during the NOP process, Defend Granite Bay requests that CDRA consider the following:

1) Based on community feedback and to date 2 CEQA challenges and significant disproportionate community impact in Granite Bay, the loophole in Residential Care homes of 7 which allows congregate or senior apartments with on-site managers to qualify as Res-Care. This needs to be addressed during the update. It is fairly argued that structures of 10,400 sq ft (Catuna), 108,000 sq ft (Ovation Senior Living) and 155,000 sq ft (Placer Retirement Residences) do not meet the intent and exceed size compatibility and intensity of Res Ag zoning district; how are these structures CEQA compatible to immediately adjacent and contiguous single family residential structures?

a) Pg 75 Residential Care homes of 7 or more.

By eliminating the need for an MUP, how is there oversight to prevent abuse of a compromised population?

b) If the goal of the update is to bring Placer County into state compliance, how is this "loophole" of not meeting state definitions and the requirements of medical evaluation not being addressed at this time? (See Letter Hanson Bridgett)

2) The Department of Housing and Community Development Division of Codes and Standards Identifies the following:

"Recreational Vehicles (RVs) are defined in HSC Section 18010. RVs may include a motorhome, travel trailer, truck camper or camping trailer, with or without motive power, designed for human habitation for recreational, emergency or other occupancy. **RVs are not intended for occupancy as a permanent dwelling.**

Manufactured home (MH) HSC Section 18007, a structure which is transportable in one or more sections... **MHs may be occupied outside or inside of mobilehome parks** and installation and approval for occupancy is governed by the Mobilehome Parks Act (MPA), HSC Sections 18200, et seq., and Title 25, CCR Sections 1000, et seq.

Park Trailers (PTs) are a type of recreational vehicle defined in HSC Section 18009.3 and often are considered tiny homes built on a chassis with wheels. **PTs, like RVs, are designed as temporary living quarters for recreational or seasonal use only, and not as a year-round or permanent dwelling."**

Since Tiny Houses on wheels would only be required to maintain proof of compliance with ANSI 119.5 standard as a recreational park trailer or ANSI 1192 (NFPA 1192) standard as a recreational vehicle, how was it determined that ***tiny houses on wheels are appropriate for year-round or permanent dwellings and qualify as an Accessory Dwelling Unit (ADU)?***

a) By approving tiny homes on wheels as year-round dwellings in conflict with the existing Health and Safety standard of the occupants is not the County in violation of State and Federal laws?

b) It would appear that the County is proposing standards which are less restrictive than national standards. By what authority is CDRA granted this privilege?

- c) Additionally, how is classifying a Tiny House as an ADU not in conflict with the Department of Housing and Community Development Division of Codes and Standards and as such in violation of California requirements?
- d) How can the county define an RV and a tiny house under the same restriction for highway mobility
- e) Why are these tiny houses on wheels not relegated to mobile homes or RV parks?
- f) If the intent is to accommodate workforce housing, why are these not permitted in farm and ag zoning districts?
- g) A tiny Home is defined as a home of 400 feet or less meeting all CA building standards and Title 24 compliant. How will the County address these building requirements if the property is registered only with the DMV and not subject to County oversight?
- h) If tiny houses on wheels are approved as permanent housing, how will a primary and secondary tiny house on wheels qualify for mail delivery? Since they would both be registered to the DMV and not the County, we ask how this situation will be remedied particularly should a tiny house on wheel cluster community be approved?
- 3) Cluster Communities have insufficient enforceable qualifiers. Please clarify how cluster communities will respect intensity and density, infra-structure and meet sensitive contact development practices rather than providing a loophole for high intensity high end development in rural communities frustrating rural community goals and policies?

6-2
cont.

6-3

The Defend Granite Bay Board and members



ALLAN D. JERGESEN
PARTNER
DIRECT DIAL (415) 995-5023
DIRECT FAX (415) 995-3433
E-MAIL ajergesen@hansonbridgett.com

May 22, 2019

Placer County Board of Supervisors
175 Fulweiler Avenue
Auburn, CA 95603-4543

Re: Placer Retirement Residences
Our File No. 36447.1

Dear Sirs/Madams:

We are writing this letter on behalf of Defend Granite Bay, a community-based nonprofit association devoted to promoting responsible, compatible development in Granite Bay. Our purpose is to clarify one aspect of the proposed Placer Retirement Residences development that the Board is presently considering for Granite Bay. More particularly, we have been asked to provide the Board with information that will assist it in properly classifying the development for land use planning purposes.

By way of background, our firm has been involved extensively with retirement housing and senior care matters for over 50 years. We represent many providers of congregate housing, assisted living, and skilled nursing in California, including multi-level and continuing care retirement communities. In addition, we serve as general counsel to the California Assisted Living Association (the organization representing assisted living providers) and LeadingAge California (the organization representing nonprofit multi-level providers of housing and care to seniors). In this capacity, we are familiar with the terminology used in senior living, as well as the regulatory requirements that govern senior living providers.

We understand that the proposed Placer Retirement Residences project will be a congregate housing facility for seniors consisting of private residential suites centered on common amenities and services. Residents will receive meals in a common dining area and will enjoy social and community activities. The monthly rent will cover three daily meals, all utilities other than a personal telephone, housekeeping, linen service, private van transportation, and an extensive schedule of classes and events. The facility will be staffed by two couples (four people) who will live on site and will serve as manager and co-manager teams. In addition, there will be a chef, an activities director, and other persons who will assist in the provision of the services. The facility will be designed for residents capable of independent living, and will not provide any medical care or assistance with the activities of daily living. In that case, it logically involves the creation of "senior apartments" and "senior independent living centers" ("SILCs")¹ subject to the requirements for "senior housing projects" under the Placer County Zoning Code.² These include certain parking requirements.³

¹ Placer County Zoning Code §17.04.030.

² Placer County Zoning Code §§17.56.210.A & 17.06.050.

³ Placer County Zoning Code §17.56.210.C.3.

Hanson Bridgett LLP

425 Market Street, 26th Floor, San Francisco, CA 94105 hansonbridgett.com

15512807.2

Placer County Board of Supervisors
May 22, 2019
Page 2

We understand that the facility will not be a "residential care home," as that term is used in the Placer County Zoning Code. Thus, it will not be providing care for seniors "in need of personal services, supervision or assistance essential for sustaining the activities of daily living or for the protection of the individual."⁴ California regulates such facilities as "residential care facilities for the elderly" (or "RCFEs"). An RCFE is defined as a housing arrangement for persons 60 years of age or over "where varying levels and intensities of care and supervision, protective supervision, or personal care are provided..."⁵ "Care and supervision" are defined as the provision of "ongoing assistance with activities of daily living without which a resident's physical health, mental health, safety, or welfare would be endangered."⁶ No one may operate an RCFE without a valid license.⁷ Licensure is by the California Department of Social Services ("DSS"), which maintains an active scheme for reviewing applications, surveying facilities, and enforcing standards as necessary. Operation of an RCFE without a license constitutes a misdemeanor, punishable by a fine of up to \$2,500, by imprisonment in the county jail for a period of up to one year, or by both.⁸ In addition, DSS may bring a legal action to enjoin the individual or company from continuing to operate the unlicensed RCFE.⁹

The RCFE law distinguishes a facility that provides care and supervision from a "congregate housing project for the elderly ... that is limited to providing ... housing, meals, transportation, housekeeping, or recreational and social activities" to its residents.¹⁰ We believe that the proposed Placer Retirement Residences development would be an unlicensed congregate housing project for the elderly, as opposed to a licensed RCFE. As such, it would not have the legal ability to provide care and supervision, as those terms are defined in California law, to its residents. If it undertook to do so, it would be guilty of operating an unlicensed RCFE and subjected to appropriate penalties in court proceedings brought by the County District Attorney and DSS.

From the foregoing, we conclude that Placer Retirement Residences development should be classified as a senior housing project, rather than a residential care facility, for land use planning purposes. If it proposed to provide residential care, then it would have to obtain an RCFE license, be inspected by DSS, and meet the care and safety standards in California law. Failure to do so would subject it to severe penalties.

Please let us know if we can provide any further information about this issue.

Very truly yours,



Allan D. Jergesen

cc: Larissa L. Berry
Carla Novaresi
Jeff Keith

⁴ Placer County Zoning Code §17.04.030.

⁵ Cal. Health & Safety Code §1569.2(o)(1).

⁶ Cal. Health & Safety Code §1569.2(c).

⁷ Cal. Health & Safety Code §1569.10.

⁸ Cal. Health & Safety Code §1569.40(d).

⁹ Cal. Health & Safety Code §1569.41.

¹⁰ Cal. Health & Safety Code §1569.145(d).

15512807.2

Responses to Comment Letter 6 – Defend Granite Bay

Response to Comment 6-1

This comment is similar to Comments 3-1 and 4-6. As noted in the response to Comment 3-1, in this comment, the commenter describes a change to the project supported by the commenter. This comment is not directed at the environmental analysis and is being referred to the decisionmakers for their consideration during their decision-making process.

Response to Comment 6-2

In this comment, the commenter describes a change to the project supported by the commenter and discusses in detail the policy reasons the commenter believes this change should be made. This comment is not directed at the environmental analysis and will be referred to the decisionmakers for their consideration during their decision-making process.

Response to Comment 6-3

In this comment, the commenter describes a change in the proposed project supported by the commenter and discusses in detail the policy reasons the commenter believes this change should be made. This comment is not directed at the environmental analysis and is being referred to the decisionmakers for their consideration during their decision-making process.

Letter 7. Sandra H. Harris, dated March 8, 2021

Letter #7

Shirlee Herrington

From: Sandra H. Harris <sandyhar@surewest.net>
Sent: Monday, March 8, 2021 9:58 AM
To: Placer County Environmental Coordination Services
Subject: [EXTERNAL] Housing Text Amendment

Please include the following comment re Housing Related Element:

As brought forward in a recent hearing before the Board of Supervisors there is a loop hole in the Zoning Code which allows facilities over 7 in RA zoning which needs to be examined.

Supervisor Uhler agreed that “there are some abuses of this particular part of our zoning ordinance” and directed staff to look at allowed uses in the RA (Residential Agricultural) zoning, specifically residential care homes with 7 or more. I believe this should be included in this element.

7-1

Sandra H. Harris
5911 Reba Drive
Granite Bay, CA 95746

Responses to Comment Letter 7 – Sandra H. Harris

Response to Comment 7-1

This comment is similar to Comments 3-1, 4-6, and 6-1. As noted in the response to Comment 3-1, in this comment, the commenter describes a change to the project supported by the commenter. This comment is not directed at the environmental analysis and is being referred to the decisionmakers for their consideration during their decision-making process. Please see also the response to Comment 6-1.

Letter 8. Sandra Harris, no date

Letter #8

Placer County Community Development Resource Agency
Environmental Coordination Services
Suite 190
3091 County Center Drive
Auburn, CA 5603

cdraecs@placer.ca.gov - Housing Related Code Amendments

This lengthy document was overwhelming to read in full and understand, but I would like to address a few things that caught my attention in the pages I read. Please review the following comments:

Does the plan take into account the trend of people leaving the state and the effect it will have on dwelling units needed?

8-1

Climate Change/global warming is a controversial concept not accepted by a large body of scientists. (Just in last few days a large segment of the country is experiencing historic low temperatures.) Some of the proposals make sense, but some of them are not well thought out and seem to be knee jerk reactions of policy makers.

8-2

ES-5 Recommending eliminating gas in all new homes and wood burning fireplaces in favor of electricity can be somewhat shortsighted. For one thing the existing electrical grid cannot support everyone plugging in electric vehicles, running air conditioning, etc. at peak times. California has already experienced blackouts at various times in last few years. Also, during a recent storm, many areas were without power for days. In the City West Sacramento, for instance, homes were without power for up to 5 days. Those with gas water heaters, gas ranges/ovens and wood burning fireplaces were able to live somewhat comfortably during the power failure. Wind power has many disadvantages – high winds or too little wind causes shut downs. Solar only works when sun is out. Makes sense for some uses, but large scale solar projects in some areas can be very harmful to ecological system of area. Having gas and electric available provides more choices for homeowners. Also, I feel the wood burned in my fireplace and grown on my property saves chipping, hauling away for miles to a disposal site, conserves gas/electricity, emits little pollutants, etc. It is very energy and environmentally efficient as opposed to wasting it.

8-3

NOTE: The batteries for electric vehicles require exotic materials mined in Africa (where it is said it is mined by child labor), and other foreign countries. China has been gaining control of these minerals in most of the countries where it is available. If United States is not energy self-sufficient, we will become dependent on China. Perhaps we should be more thoughtful about mandating energy use and give the technology time to catch up to the needs.

8-4

Sandra Harris



Responses to Comment Letter 8 – Sandra Harris

Response to Comment 8-1

A detailed explanation for the assessment of existing population conditions and forecasts is provided on pages 3.14-3 and 3.14-4 of the Draft EIR. This discussion acknowledges that population growth in Placer County has slowed from the very high rate of growth to 2010, and that growth in 2019 was 2 percent. While changes in nationwide and state-wide population movements do affect Placer County, as described in Section 3.14 of the Draft EIR, Placer County population continues to grow.

Response to Comment 8-2

The basis for the assessment of climate change and greenhouse gas impacts in the EIR are presented in the setting section on pages 3.8-6 through 3.8-8 of the Draft EIR, and in the Methodology section on pages 3.8-8 and 3.8-9 of the Draft EIR. References supporting the information provided in these sections are provided on pages 3.8-19 and 3.8-20 of the Draft EIR.

Response to Comment 8-3

As noted in the response to Comment 4-9, Mitigation Measure AQ-2, to which the commenter refers, would restrict future residential construction associated with the project only. It would not apply to existing residences. People could choose whether or not to purchase such a residence.

Response to Comment 8-4

The commenter expresses their opinion on the potential downsides of electric vehicles and perhaps other types of energy requiring battery storage. Mitigation Measure EN-1b does not create new requirements, as these measures are already part of adopted County plans.

Letter 9. Greg Hendricks, Central Valley Regional Water Quality Control Board, dated March 12, 2021

Letter #9



Central Valley Regional Water Quality Control Board

12 March 2021

Shirlee Herrington
Placer County
Community Development Resource Agency
3091 County Center Drive
Auburn, CA 95603

CERTIFIED MAIL

COMMENTS TO REQUEST FOR REVIEW FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, PROPOSED HOUSING STRATEGY AND DEVELOPMENT PLAN, SCH#2019080460, PLACER COUNTY

Pursuant to the State Clearinghouse's 21 January 2021 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Draft Environmental Impact Report* for the Proposed Housing Strategy and Development Plan, located in Placer County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

I. Regulatory Setting

Basin Plan

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources Control Board (State Water Board), Office of

KARL E. LONGLEY SCD, P.E., CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

11020 Sun Center Drive #200, Rancho Cordova, CA 95670 | www.waterboards.ca.gov/centralvalley

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Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:

http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/

Antidegradation Considerations

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at:

https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_2018_05.pdf

In part it states:

Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.

This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

II. Permitting Requirements

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), Construction General Permit Order No. 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). For more information on the Construction General Permit, visit the State Water Resources Control Board website at:

9-1
cont

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http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml

Phase I and II Municipal Separate Storm Sewer System (MS4) Permits¹

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml

Industrial Storm Water General Permit

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 2014-0057-DWQ. For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml

Clean Water Act Section 404 Permit

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE). If a Section 404 permit is required by the USACE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements. If you have any questions regarding the Clean Water Act

9-1
cont

¹ Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

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Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACE at (916) 557-5250.

Clean Water Act Section 401 Permit – Water Quality Certification

If an USACE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications. For more information on the Water Quality Certification, visit the Central Valley Water Board website at:
https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality/certification/

Waste Discharge Requirements – Discharges to Waters of the State

If USACE determines that only non-jurisdictional waters of the State (i.e., “non-federal” waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation. For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at:
https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/

Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more information on the General Order 2004-0004, visit the State Water Resources Control Board website at:
https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf

Dewatering Permit

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Threat General Order) 2003-0003 or the Central Valley Water Board’s Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage

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cont

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under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wgo/wgo2003-0003.pdf

For more information regarding the Low Threat Waiver and the application process, visit the Central Valley Water Board website at:

https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2018-0085.pdf

Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf

NPDES Permit

If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit. For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at: <https://www.waterboards.ca.gov/centralvalley/help/permit/>

If you have questions regarding these comments, please contact me at (916) 464-4709 or Greg.Hendricks@waterboards.ca.gov.



Greg Hendricks
Environmental Scientist

cc: State Clearinghouse unit, Governor's Office of Planning and Research,
Sacramento

9-1
cont

Responses to Comment Letter 9 – Greg Hendricks, Central Valley Regional Water Quality Control Board

Response to Comment 9-1

The Central Valley Regional Water Quality Control Board (CVRWQCB) details the various regulatory and permitting requirements under the agency's jurisdiction. Although the project does not propose any site-specific development, it would allow for new dwelling units that could occur through implementation of the project. Future development would still be required to comply with all relevant laws and regulations, including any pertaining to water quality under CVRWQCB jurisdiction.

Transcript. Planning Commission Meeting held February 11, 2021

Letter #10

Housing-Related Code Amendments

February 11, 2021 – Planning Commission Meeting Comments on DEIR

(Commissioner Woodward) - Found the EIR to be, frankly, pretty confusing, that is somewhat related to the fact he is new to the Planning Commission.

I'm going to step you through a variety of things that will hopefully be useful as you put together the Final EIR.

10-1

Perhaps there's some food for thought and will help me understand why we approach these things the way we have, at least in this particular case, so that it'll benefit me in the future as well.

Just a quick administrative comment, so you know, the second paragraph of the Executive Summary, second sentence, is obviously an important sentence, but it is not a sentence, so you may want to take a look at that.

10-2

More to the point and more specifically in terms of the broader question I had a problem understanding from the EIR the scope of the EIR I'll explain why by stepping through several points here so please bear with me as I do that.

Your explanation helped me so that may be a good baseline for perhaps some adjustments to the language in the EIR, I don't know.

Executive Summary, page 1, This document targets amendments to the Placer County General Plan, County Zoning Ordinance, Zoning Maps, community design guidelines. I think that's an exact phrase you used as well, or basically the same type of thing. And then it goes on to say it allows more variation in the development areas where infrastructure and development already exists. Okay, so that gives me the idea that first we're talking about a fairly broad scope of a document. This actually affects everybody's planning documents in unincorporated Placer County. Is that a true statement?

10-3

(Dobbs) – “Yes”

(Woodward) - But at the same time it doesn't focus broadly on those plans. In other words, it really tries to drive to places where infrastructure and development already exists. Correct?

(Dobbs) – “That's correct”

(Woodward) - Then in some of the mitigation statements that are articulated in the document as you step through it. Like for example, ES-3 part of the mitigation statement, the document specifies that projects that are located on quote “underdeveloped parcels in areas where, and areas that are surrounded by limited urban development will include a lighting plan”. So that's a mitigation strategy associated with a lighting plan. So this is where I got confused because I literally stepped from ES-1 to ES-3 and now you're talking about a mitigation strategy associated with underdeveloped parcels in areas that are surrounded by limited urban development. So do you understand where I'm getting the disconnect here? Because literally on ES-1 you talk about where infrastructure and development already exists, and then ES-3 you discuss underdeveloped areas. Now the reason I think this is important is because this goes to the scope of the whole document. The question is, are we addressing

10-4

underdeveloped areas as well here. Are we going to modify plans associated with those areas as well or not? And the answer is...

(Dobbs) – Most of these communities are built out, but we’re looking for those parcels that were left behind and where those opportunities exist. And I think that some of the broadness in the language just reflects the different characteristics of these communities from very rural areas to more suburban areas, but those areas that are more on the fringes that are maybe adjacent to single family zoning, those lighting plans would ensure that there’s no light trespass. In terms of meeting population projections and housing needs, we have room to sprawl in you will, or grow into more rural areas of the County. It’s going to take a long time because of the infrastructure limitations. So this is really a matter of where do we want to see that future housing, and will certainly relate to the timing because having infrastructure in place will accelerate the construction of housing.

10-4
cont.

(Sally Zeff) – I thought I might have a clarification for the commissioner that might address his concern. Some of the mitigation measures are addressing impacts that might only occur in some areas. That’s not limiting where the project applies, but when the changes to the policies and ordinances are implemented, in fact, some impacts may only occur in some areas. So, this Mitigation Measure, MM AES-2, that the Commissioner is talking about, is talking about is where specific impacts might occur in underdeveloped areas. So, it’s not about limiting where the project may occur, but where some impacts might occur.

(Woodward) – Right, All I’m saying, and perhaps you have to do this from a legal perspective. If you narrow the scope of the document and you go to a mitigation strategy which appears to indicate that the document is very broad in scope, that then gives the authority of the County, or whomever, to take broad action in the future, perhaps, to modify, for example, the Granite Bay Community Plan, which is a community that I represent. So I just want to make sure I understand, what authority are we giving to the County by using this EIR? And so when you make references to places like underdeveloped infrastructure areas it seems to make the document more broad in scope and provide more authority to the County than I would have anticipated we would want to approve, that’s all.

10-5

Let me step through the next point as well on this. On page 2-1, under project setting where there’s information provided about the size of Placer and 150,000 residents, etc., so that would tend to indicate that we have rather sweeping document that we’re considering here.

10-6

On page 2-2 there’s a list of Community Plans. There’s sixteen Community Plans listed there, and according to the document and this is a quote, “None of these Community Plans are proposed for amendment as part of the project.” That includes the community of Granite Bay, for example, and probably communities associated with everyone on this panel. That’s a quote right of the document. Then it goes on, however, on page 3.11-15, there’s a table that lists twenty-three Community Plans, including those listed on page 2-2, and it states the project includes targeted amendments to the Placer County General Plan, Zoning Ordinance, map, and community design manual, which would apply to the listed plans.

10-7

(Dobbs) – I understand how this could be confusing. I appreciate your questions. Maybe I could give an example for Granite Bay that might help, because we aren’t changing any of the community plans. If a

project came in on a vacant parcel in Granite Bay, say on Douglas Blvd., the Community Plan has very specific design guidelines for landscaping and frontage requirements along Douglas Blvd., those would still apply. If the project was mixed-use or multi-family then these new design standards that would apply County-wide, will apply to the actual project. So, depending on the project type it could involve a combination of community plan standards, as well and standards in the Design Manual. These are very specific standards related to housing.

10-7
cont.

(Woodward) – Okay, so this project probably does affect every single representative here and every supervisor's district. So the only caution I have is that on page 2-2, where it says quote "none of these plans are proposed for amendment as part of the project, you review that language. At least, that does not appear to be an accurate statement. Obviously, if it's inaccurate it's a mistake, I'm not implying other than that. It just may be an error.

10-8

(Dobbs) – It's just how these plans relate to each other, and augment on another. Thank you for your comment, we will review that language on how the project affect's community plans.

(Woodward) – Thank you for that. Can you elaborate a little bit about why we include references to 194 units in this plan?

(Dobbs) – There are the 194 parcels with base zoning of single-family residential, that are served by municipal sewer and water, and are within one-half mile of transit. There's some parcels in North Auburn, and others along Highway 89 in the Squaw Valley area. There's none in Granite Bay, because you're not currently served by transit. Those single-family residential parcels already allow three units. This would be an above-and-beyond, which would enable them to get four. That fourth unit would be deed restricted to affordable housing. Again, it would just apply in these very focused areas along major transportation routes. We're not talking about four individual detached houses. We're talking about carving up the biggest house you can imagine in the community and having four units within it. So these are intended to be the scale as the existing community.

10-9

(Woodward) – And so you put this in the EIR as an example?

(Dobbs) – When we started this, the state did not allow three units at that time, so it was kind of sweeping at the time, but now the state allows three units. It is just one more. It is in these focused areas. It would require a deed restriction for affordability. I don't know how many people would take advantage, but it does help us reach our regional housing allocation numbers that shows that we have the capacity for the anticipated growth in the County. But that's an example where your recommendation or the Board may say that's not a great idea. We don't want those 194 fourth units. And that's okay, but it's not going to change the environmental document. So those policy decisions that are yet to come, they really don't have an impact of what was covered.

10-10

(Woodward) – I'm really just trying to understand, precisely, the scope of the document, because we're not talking about individual projects at this point. We also talk about the Sacramento Council of Governments, and that has tasked us, or asked us, or supports the creation of 7,900 units, or whatever the number is, between now and 2029?

10-11

(Dobbs) – We're projecting a shortfall of the units that are allocated to the jurisdiction and the units that will actually get developed in that timeframe. Not surprisingly, many of the people that fall within that need are in different income levels that don't allow for market rate housing. This does help us meet our

allocation from SACOG, and does focus on providing a range of housing types that does provide more affordability, and concentrate those in existing developed communities.

10-11
cont.

(Woodward) – Okay, so this is a very sweeping change?

10-12

(Dobbs) – This a comprehensive set of policy amendments that either way you go don't have a big change of environmental impacts.

(Woodward) – Alright, this is a sweeping document in my view. I understand the scope better now, so thank you for that. The second substantive question I have is why? And this will help me understand probably future approaches from the County on how we do these things. So, why would we do this rather than address these issues when we do individual projects?

(Purvines) – Under California law, so this is beyond SACOG, requires all jurisdictions in the state to accommodate a fair share of housing. That is the regional housing allocation that comes down through the department of finance to each of the regions. The state also mandates that each jurisdiction adopt a Housing Element as part of their General Plan. That Housing Element is required to identify the ways in which we will meet our RHNA. And so in our Housing Elements we look at ways that will reduce the constraints for the development housing. As part of this project, this was an opportunity to go back into some of our more general codes, so the General Plan, the County Zoning Ordinance, and to our design guidelines at the time, and look for where there are areas that we can reduce those constraints. So this is a package of those items that was determined by a number of different things that Patrick talked about. One, we interviewed some of our builders and developers that have processed applications, building permits, through the County to determine what some of the hurdles they had were and where we might be able to help streamline that development. We also did a comprehensive look at other jurisdictions that had successfully modified their codes and ordinances and had some success with streamlining their development. And then we just took straight out of state law, since about 2017, we've had a substantial amount of changes in state law that are directing jurisdictions where we're going to streamline housing. Patrick mentioned one of those which is SB35. Taking all of those together, we went through our general codes, our General Plan, our zoning, and looked for those areas that we could identify and make those modifications so projects could come through the process more quickly. Many of the projects are still going to require some level of discretionary review, they will just be applied these new standards, or these new changes. The question about community plans came up. Community plans are essentially considered General Plans and all of the community plans are very different, none of them look the same. Some rely more on County zoning, others rely less on County zoning and have their own zoning build into them. So where those community plans would rely on more general policies they would fall back to these general policies. Where those community plans have their own specific requirements or guidelines then those would be applied. So each community is just a little bit different. This package is really just dealing to the general. The General Plan, general zoning, and the general multi-family and mixed-use design standards.

10-13

(Woodward) – You did say though, this will help streamline the process of bringing these projects forward, right?

10-14

(Purvines) – Correct

(Woodward) – This is the crux of my, if I had a concern it would be that because this affects 21 or 23 community plans, all of which are represented on this panel, all of which will be represented by the supervisor's. I'm not confident that I'm willing to say that Granite Bay wants small houses on wheels. So we need to make sure that each one of those projects will be addressed properly and that's not, and we are not today, or in the future, when we consider this EIR final, saying that that's a good idea for Granite Bay or any other location represented here.

10-15

(Purvines) – Today is just for the comments on the draft EIR and the adequacy of the EIR.

(Woodward) – This is just an interesting way to approach this. I'm not sure I understand still.

(Chairman Hauge) – One of the things we have to look at. The General Plan is our constitution. Everything has to be consistent with the General Plan. Granite Bay's specific plan, other specific plans have to be consistent with the General Plan and constitution. And then you start moving down into the zoning code. All of those things have to be consistent. So one of the things the EIR looks at is to make sure all is consistent. So as a project comes into Granite Bay, a project shall be, it has to be consistent with the Granite Bay community plan. It cannot do something that is not allowed by the community plan. So as a commission, that's what we're obligated to look at as projects come through. Including the staff when they're doing a project review they have to determine if that project is consistent with the General Plan, the community plan and then the zoning code. So it's a tiered system where everything has to be consistent. The EIR looks at that consistency and so it's not going in and adjusting the community plan. Other than, maybe in some ways, the state of California has done some sweeping changes. For one, if you had multi-family housing, if you had a limit of thirty feet now I think you can go up to sixty feet. By the state just saying you can do this. And you can increase your density by 50 percent. County has nothing to say about it. That's a use by right. The state has made that determination. So there are some things that the state of California has determined for this County that we have no say over. And it does impact the community plan, but the state trumps the General Plan. The state trumps the community plan.

10-16

(Woodward) – Sure. It's just interesting to me that this requires an EIR when it appears to be actions associated with policies that supports statute. So if this is a law, why are we writing an EIR on it?

(Hauge) – Because we're interpreting the law as a County, interpreting the law and adding new zoning codes or changes that do have to be evaluated under CEQA.

(Clayton Cook) – If I could just add one point. The state legislature obviously makes the laws. Once the County then enacts those laws, any action that the County takes still has to be subject to that environmental review. So even though the state says you have to do this, if the County is going to undertake any of its own action it has to evaluate each of those to see if there is going to be an environmental impact. And in this situation the County is looking at the Housing Element and updating its Housing Element so it has to look at the environmental impacts of that update. Depending on the level of impacts depends on the level of environmental review. Here we have an Environmental Impact Report. It's largely saying that the impacts are being reduced, and these changes are more processing changes that won't have the environmental impacts. But we still have to go through that process when the County's making a formal change to something.

10-17

(Woodward) – Okay, I will say this. When this comes back I would clearly like to understand what’s law, what’s SACOG, who’s telling us to do what? Obviously if this is law then it’s easy to figure out. But if this is some council of governments then perhaps it’s not law, perhaps it’s just a recommendation. We need to understand who’s telling us to do what here. Because frankly, I found the EIR to be quite confusing in this area. We kind of scattershot a bunch of different things into this, including 196 units, including it can be all over the County, including 21 plans, but actually 16 it doesn’t apply to, but in fact it does. Those kinds of issues are in there.

10-18

A couple of more specific things. Because there’s no specific project here, this is a difficult thing from an EIR writer’s perspective to get your arms around. But I’ve got to say, it was mystifying to read in some ways. This proposal deals with all of the community plans, the General Plan, etc., etc., and yet we found no impact whatsoever for Land Use and Planning, public services, recreation, utilities, service systems, and transportation. No impact. No mitigation. No nothing, just no impact.

10-19

So let’s take a look at two of these real quickly. 3.11-20 discusses environmental impacts of land use and planning and according to the document it says CEQA requires that and EIR consider if a project will quote “conflict with any applicable land use plan, policy, or regulation that was adopted for the purpose of avoiding or mitigating for any environmental impact.” That’s a quote. So what you’re telling me when you say there is no impact is that you have considered 21 different plans and concluded that there is no impact to land use and planning. Yet the whole purpose of this document is to modify all of these plans. True?

10-20

(Purvines) – The proposed changes do not modify any of the community plans and the impacts we’re looking at, and Sally Zeff from ICF can also address this, looks at any new impacts. So what’s allowed today, and looks at based on the change will it actually create a new impact. So it did go back through and look at all the plans and then determined if, based on those changes, is there a determination of a new impact that would be created by this change. As was stated before, there’s no proposed amendment to the community plans as part of this.

(Woodward) – Okay, so Page 3.11-15, I’m sorry but I’m returning to that. Community Plans are listed in this table, including those listed on page 2-2, and states the project includes targeted amendments to the Placer County General Plan, Zoning Ordinance, maps, and community design manual which would apply to the listed plans.

(Purvines) – Correct. Going back to the community plans themselves, each community plan is very different. Some community plans are just policy documents, others are more policy documents with some zoning, some are policy documents, zoning, and have design standards. They’re all very different. So looking at what was being proposed here did not affect change, something that’s been adopted in a community plan. It does not necessitate going in and amending a community plan. So it doesn’t mean that areas in plans might not be subject to these things, it just means that the plan itself, the document, did not need to be amended as part of these changes.

10-21

(Woodward) – Okay, so I won’t even bother with the second one because the same logic applies. The only caution I have, or the only statement I have here is this. This is a sweeping document, I think. This will fundamentally affect the complexion of housing across the County it appears to me. And the direction we go, some of which is directed by statute apparently. SB 35 I read that to the best of my ability and understood some of it. And I understand that, and some of it is optional. But this is a

10-22

significant document so I suggest that you take, at least, some of these points and take a look at that when you do the final EIR because I will really want to understand what we are doing with this document when it comes forward for final review.

10-22
cont.

(Commissioner Herzog) - Patrick, can you go back to your zoning sentence slide? I liked that phrase that you used. Because I think it's important for clarification. So here we have the existing and proposed zoning codes. On the left, each one of those letters and numbers mean something. They have a meaning. Then when we go to the right there's some more consolidation of that. I guess what I'm asking you is are all of those letters and numbers somehow still represented in the proposed zoning so it's not lost. Because I guess I'm also asking what is lost in simplifying the code? Or are those all assumed now, by ministerial assumptions in the proposed zoning?

(Dobbs) – It's really a shift in things like what type it is. So things like lot sizes, setbacks, and such, still apply but as opposed to applying at a combining zoning district level, it's really based on are we talking about townhomes, or are we talking about four-plexes, because each of those housing types will have different standards. So the short answer is no, none of this gets lost, it's just re-captured and simplified, and really relies on the base zoning and these new established standards for these different housing types. And gets rid of more of the scattershot, compiling these combining districts together to get what we're really looking for which we think we have accommodated in this new design manual.

10-23

(Commissioner Johnson) – Maybe for clarification. Where the -UP is dropped that means it's by-right, correct?

(Dobbs) – So C1 is neighborhood commercial, it'll have it's own land use table. Those uses that are permissible are going to range from different commercial uses to public service uses. All of these individual uses are going to have their own level of entitlement. SO anything that has potential to be in conflict is still going to require some sort of Minor Use Permit or Consitional Use Permit. But where you're designated for multi-family zoning, and you're basing it on objective standards that would shift toward ministerial. Instead of just this blanket statement that everything here requires a use permit it's really more subject to what those individual uses are, and certainly a number of them will still require a use permit if there's any likelihood that there will be loss of enjoyment or quality of life for surrounding properties.

Public Comment

(Marilyn Jasper) – speaking on behalf of the public interest coalition. Commissioner Woodward's comments are greatly appreciated. We realize this is an EIR discussion but just want to bring up two points. To many environmental advocates the word quote streamline quote is often a red flag. I won't take time to give examples of how some of the grave concerns come about and have merit as soon as something is streamlined. The second point, with the fourth unit, affordable housing unit, in some cases affordable housing, where it is permitted, it comes with significant financial breaks, huge permit cost reductions are granted, but if this EIR is to cover impacts, the amendment needs to be specific, in writing and enforceable, the language, as to when and if the affordable housing overlay and code expires. To me, affordable housing should be in perpetuity. You got those breaks, you're there. But it goes with the property, and some expire in amazingly, ridiculously short years, and revert back to market rate housing

10-24

and the whole benefit of being affordable is lost. And then there would be impacts that are in the future but I hope the EIR would either make sure the language was in there so that doesn't happen, or mitigate the impacts.

10-24
cont.

Public comment closed.

(Commissioner Johnson) – I have a few comments here and I'm going to qualify these as editorial, not substantial. If we could show figure 2-2, Projects Under County Jurisdiction, can you get that up on the screen? On this map, and this is really a minor point, you look where Tahoma is and you go west and you see a large block of commercial zoning. At least the map I have shows it as being National Forest Land and the access is very poor, and so I question why that would even be necessary to show on the map because it's certainly not available for anything in the County. Unless, it's exchanged with the Forest Service.

10-25

(Dobbs) – It looks like an anomaly, typically you don't see this higher intensity zoning out in the forest like that. We'll have to look into that.

(Johnson) – I would suggest you drop that but it's up to you guys.

Okay, when we get to the water part of this. I had 3.10-8 and there's listing of the Upper American watershed and shows several lakes and reservoirs in El Dorado County, as well as some of like French Meadows, Hell Hole, and Lake Valley in Placer County, but it doesn't show Sugar Pine Reservoir, which really is the source of water for the Foresthill community. And so, it's not a big point, but by leaving that out people are going to pick up on that.

10-26

And I'll also mention that someplace in here, where there's listing of water districts, I didn't notice the Foresthill Public Utilities District listed as a water district and so that would need to be corrected.

10-27

Maybe just two more editorial things.

Fire stations. And this is on 3.15.16, and it list a lot of full-time Placer County fire stations. To me it looks like those that are contract stations with the County. But, also there's fire stations in the Tahoe area, particularly at North Star, Squaw Valley, and a portion of the North Tahoe Fire District includes Alpine Meadows, and so I think those should probably be listed. Also Meadow Vista, and Foresthill, and Newcastle, Penryn, have their own fire departments. As well as Foresthill, and so I would suggest get a more complete list of the fire stations in Placer County.

10-28

Finally, I guess the area where I'm a little bit confused is the 89 corridor, it's got listed 41 units. It's the biggest number of units in the east side of the County and when I look at the map of that corridor, it's very complex with predominantly National Forest Land, a lot of small parcels in there that are actually developed with cabins, pretty fancy cabins. And maybe a little bit of land around the mouth of Squaw Valley, but I think when the focus of the east side of the County is going to be on 41 units on the 89 corridor, then maybe a little bit more explanation of what we're talking about there in terms of availability of land and how that might interact with the public land that surrounds it. So that would be just an idea, a suggestion.

10-29

I guess that's my comments. You can see they're not that substantial, they're editorial, but it might help improve the document and clarify some things.

Responses to Comments made during Planning Commission Meeting – Various Commenters

Response to Comment 10-1

This comment introduces the Commissioner's comments. No response is required in the Final EIR.

Response to Comment 10-2

The Commissioner identified a grammatical error in the Executive Summary of the Draft EIR. The following correction is made in the text of the Draft EIR on page ES-1:

Unincorporated Placer County currently has sufficient area to meet its housing demand, as described in great detail in *Chapter 2, Project Description*; however, housing development in unincorporated Placer County has been slow and difficult for multiple reasons, including market conditions, infrastructure constraints, and regulatory/environmental barriers. Through its updates to the General Plan, Zoning Ordinance, and the adoption of a Design Manual for multi-family and mixed-use development, ~~the~~ the project proposes to facilitate and accelerate housing development by allowing for more variation of development in areas where infrastructure and development already exists.

Response to Comment 10-10-3

In this comment, the Commissioner asked a question about the project that was answered in the meeting. The transcript in 10-3 records the Staff's response that the Commissioner was correct that the project affects planning documents and tries to drive development to places where infrastructure and development already exists. Please see the answer from Staff in 10-3 for the full recording of the Staff's response. No further response is required in the Final EIR.

Response to Comment 10-10-4

In this comment, the Commissioner asked a question about the project that was answered in the meeting. The transcript in 10-4 records the Staff's response that mitigation measures identifying specific types of areas where a mitigation measure applies, such as underdeveloped parcels surrounded by limited urban development does not mean that the Project is limited to such areas. Please see the answer from Staff in 10-4 for the full recording of the Staff's response. No further response is required in the Final EIR.

Response to Comment 10-10-5

The Commissioner asked about how the EIR might affect the Granite Bay Community Plan. As noted in Patrick Dobbs' response to the Commissioner's question (10-10-7) regarding the Granite Bay Community Plan, the project would not result in any changes to the Granite Bay Community Plan. The EIR itself only evaluates the environmental impacts of the project.

Response to Comment 10-10-6

The Commissioner noted that the EIR states the size of Placer County on page 2-1 of the Draft EIR. This is the Project Location section of the document, which identifies where the project is located. As stated on page 2-2 of the Draft EIR, "A number of the unincorporated communities within the county are covered by the adopted community plans listed below, in addition to the County General Plan. None of these plans are proposed for amendment as part of the project."

Response to Comment 10-10-7

In this comment, the Commissioner asked a question about the project that was answered in the meeting. The transcript in 10-7 records the Staff's response that the Project does not involve changes to community plans, but does apply in areas subject to community plans. Please see the answer from Staff in 10-7 for the full recording of the Staff's response. No further response is required in the Final EIR.

Response to Comment 10-10-8

The statement on page 2-2 of the Draft EIR has been reviewed and is correct. The project does not include amendments to adopted community plans. Please see the response in 10-10-7 to the Commissioner's question.

Response to Comment 10-10-9

In this comment, the Commissioner asked a question about the project that was answered in the meeting. The transcript in 10-9 records the Staff's response explaining how the 194 fourth units referenced in the EIR were calculated based on 194 parcels with base zoning of single-family residential, that are served by municipal sewer and water, and are within one-half mile of transit. Please see the answer from Staff in 10-9 for the full recording of the Staff's response. No further response is required in the Final EIR.

Response to Comment 10-10-10

In this comment, the Commissioner asked a question about the project that was answered in the meeting. The transcript in 10-10 records the Staff's response that this element of the Project, as with other elements of the Project, is a policy decision that will be considered by the Planning Commission and the Board of Supervisors. Please see the answer from Staff in 10-10 for the full recording of the Staff's response. No further response is required in the Final EIR.

Response to Comment 10-10-11

In this comment, the Commissioner asked a question about housing numbers and SACOG that was answered in the meeting. The transcript in 10-11 records the Staff's response that the project is intended to help the County meet its housing allocation from SACOG. Please see the answer from Staff in 10-11 for the full recording of the Staff's response. No further response is required in the Final EIR.

Response to Comment 10-10-12

In this comment, the Commissioner asked a question about the project that was answered in the meeting. The transcript in 10-12 records the Staff's response that the project is a comprehensive set of policy amendments that don't result in a big change of environmental impacts. Please see the answer from Staff in 10-12 for the full recording of the Staff's response. No further response is required in the Final EIR.

Response to Comment 10-10-13

In this comment, the Commissioner asked a question about the project that was answered in the meeting. The transcript in 10-13 records the Staff's detailed response explaining the connection between the County's General Plan, Zoning Ordinance, and community plans, and also the

connection between the County's policy and regulatory documents and state law. Please see the answer from Staff in 10-13 for the full recording of the Staff's response. No further response is required in the Final EIR.

Response to Comment 10-10-14

In this comment, the Commissioner asked a question about the project that was answered in the meeting. The transcript in 10-14 records the Staff's response that the project will streamline the process of bringing housing and affordable housing projects forward. Please see the answer from Staff in 10-14 for the full recording of the Staff's response. No further response is required in the Final EIR.

Response to Comment 10-15

In this comment, the Commissioner asked a question about the process and the purpose of the Draft EIR comment meeting that was answered in the meeting. The transcript in 10-15 records the Staff's response that the hearing was focused on comments on the Draft EIR. Please see the answer from Staff in 10-15 for the full recording of the Staff's response. No further response is required in the Final EIR.

Response to Comment 10-16

In this comment, the Commissioner asked a question about the EIR and planning processes that was answered in the meeting. The transcript in 10-16 records Chairman Hauge's response explaining the connection between the County's General Plan, Zoning Ordinance, and community plans, and also the connection between the County's policy and regulatory documents and state law. Please see the answer from Chairman Hauge in 10-16 for the full recording of his response. No further response is required in the Final EIR.

Response to Comment 10-17

In this comment, the Commissioner asked a question about the EIR and planning processes that was answered in the meeting. The transcript in 10-17 records Chairman Hauge and Staff's response explaining why the project, which is a policy and regulatory project, requires evaluation under CEQA. Please see the answer from Chairman Hauge and Staff in 10-17 for the full recording of Chairman Hauge and Staff's response. No further response is required in the Final EIR.

Response to Comment 10-18

The specific County actions that are proposed and evaluated in the EIR are summarized in the second paragraph of Section ES.3 and in detail in Section 2.1, 2.2, 2.3, and 2.4 of the Draft EIR. Section 2.4.5 of the Draft EIR describes how the proposed project will bring the County into compliance with SB5. Section 2.4.6 of the Draft EIR contains a projection of how many housing units could be developed in the County as a result of the changes in the Zoning Ordinance proposed as a part of the project. The EIR uses this projection as a basis for the environmental analysis where impacts are affected by growth in housing units.

Response to Comment 10-19

Please see the response to Comment 10-18 regarding the project description. While there is no proposed physical development project, there is a specific project, as described in Draft EIR. Also, as

noted in 10-5, 6, and 8, no changes are proposed for any of the adopted community plans as a part of this project.

The Commissioner is correct that the EIR concluded that the project would not result in significant impacts on land use, public services, recreation, utilities and service systems, and transportation. The basis for those conclusions is provided in detail in the corresponding sections of the Draft EIR. No mitigation is required for impacts that are less than significant.

Response to Comment 10-20

In this comment, the Commissioner asked a question about the project that was answered in the meeting. As noted in the response from staff at the meeting, no changes are proposed for any of the adopted community plans as a part of this project. No further response is required in the Final EIR.

Response to Comment 10-21

In this comment, the Commissioner asked a question about the project that was answered in the meeting. As noted in the response from staff at the meeting, no changes are proposed for any of the adopted community plans as a part of this project. No further response is required in the Final EIR.

Response to Comment 10-22

In this comment, the Commissioner summarizes his comments. Please refer to the responses to other comments by this Commissioner.

Response to Comment 10-23

In this comment, the Commissioner asked a question about the EIR and planning processes that was answered in the meeting. The transcript in 10-23 records the Staff's response explaining how the simplified zoning code and the Design Manual together retain existing requirements. Please see the answer from Staff in 10-23 for the full recording of the Staff's response. No further response is required in the Final EIR.

Response to Comment 10-24

The commenter expresses concerns that the affordability benefits of a 4th housing unit could be lost in the future and asks that the EIR examine the impacts of this. While housing affordability is an important concern, and the County is addressing affordability through a variety of planning and regulatory actions, housing affordability is not an environmental concern addressed through CEQA. As stated in CEQA Guidelines Section 15131, economic and social effects shall not be treated as significant effects on the environment. For this reason, this comment is not directed at the environmental analysis and is being referred to the decisionmakers for their consideration during their decision-making process.

Response to Comment 10-25

The Commissioner asked a question about mapping. The area identified is a Section of land (i.e., 640 acres) owned by the USFS and is zoned Resort which falls under the County's commercial zone districts. The resort district is applied to mountainous areas, water-oriented, or other areas with significant natural amenities and commercial recreational potential, with good access to major highways. Numerous recreational uses are permissible within the RES zone district. The property is currently zoned RES-B-X- 10 ac. minimum parcel size. Because the existing zoning base is

commercial and includes the -B combining district, consistent with the project description, the combining district of the affected resort zoned parcels will be replaced with the design review combining district.

Response to Comment 10-26

The Commissioner asked a question about mapping. In response to this comment, the text of the Draft EIR was revised to add Sugar Pine Reservoir to the list of reservoirs in the Upper American River watershed on page 3.10-8 of the Draft EIR.

Response to Comment 10-27

The Commissioner noted that the Foresthill Public Utilities District is not listed on Table 3.15-1. Table 3.15-1 is revised to include the Foresthill Public Utilities District.

Response to Comment 10-28

The Commissioner noted a number of fire stations not listed on Table 3.15-3. Table 3.15-3 presents County fire stations. The stations noted by the Commissioner are operated by Special Districts and therefore were not presented in this table. The Commissioner's comment that there are additional fire safety providers is noted and incorporated into the Final EIR. The following text explaining the presence of additional fire protection services has been added to the text of the Draft EIR under Fire Protection Services on page 3.15-16 of the Draft EIR as follows:

Placer County Fire operates out of 14 total stations (eight full-time stations and six volunteer stations). All stations are listed below in Table 3.15-3. **In addition to County fire stations, other fire protection services in the County are operated by Special Districts or volunteers. Examples include fire stations operating in the Tahoe area (e.g., North Star, Squaw Valley, Alpine Meadows). The cities of Meadow Vista, Foresthill, Newcastle, and Penryn have their own fire departments.**

Response to Comment 10-29

The Commissioner asked a question about mapping. The question is related to number of parcels in the east County eligible for density bonus provisions that would allow duplexes, triplexes, and fourplexes. As noted in the EIR, the affected parcels were selected because they met the criteria of single-family residential zoning, served by municipal sewer and water, and located within 0.5 miles of a public transit stop. Land availability in this area is limited with most of the privately owned land directly fronting Highway 89. Due to the high tourism demands and existing recreational uses on public lands in the eastern County workforce housing is especially needed near resort areas such as Squaw Valley on Highway 89.

Chapter 3

Revisions to the Draft EIR

This chapter describes revisions that have been made to the Draft EIR. **Bold** text indicates where additions were made to the original text. ~~Strikeout~~ indicates where the original text was deleted.

CEQA Guidelines Section 15132 provides that a Final EIR must include, among other things, the Draft EIR or a revision of the draft. This chapter identifies the text changes that have been made to the Draft EIR. The changes are arranged by the chapter or section of the Draft EIR in which they are found and referenced by page number.

Changes Throughout the Document

Corrected a typo by changing the numbering of and reference to Mitigation Measure AES-2 to AES-4 on pages ES-3, ES-39, 3.1-22, and 5-3 as follows:

Mitigation Measure AES-~~24~~: Implement Lighting Plan

Executive Summary

The following correction is made in the text of the Draft EIR on page ES-1:

Unincorporated Placer County currently has sufficient area to meet its housing demand, as described in great detail in *Chapter 2, Project Description*; however, housing development in unincorporated Placer County has been slow and difficult for multiple reasons, including market conditions, infrastructure constraints, and regulatory/environmental barriers. Through its updates to the General Plan, Zoning Ordinance, and the adoption of a Design Manual for multi-family and mixed-use development, ~~the~~ **the** project proposes to facilitate and accelerate housing development by allowing for more variation of development in areas where infrastructure and development already exists.

The following corrections were made in Table ES-1, *Impacts and Mitigation* on pages ES-39 and ES-40:

- The reference to Mitigation Measure AES-2 changed to AES-4: AES-~~24~~
- The reference to Mitigation Measures AQ-3a and AQ-3b deleted: MM-AQ-2, ~~AQ-3a, AQ-3b~~
- Under Energy impact, level of significance (in the summary table) changed from S to LTS and reference to Mitigation Measures deleted to correctly reflect the text of the DEIR: **LTS**; ~~MM-EN-1a and EN-1b~~
- The reference to Mitigation Measures GEO-2 and GEO-3 deleted: ~~MM-GEO-2, GEO-3~~, GEO-6
- Under Hydrology and Water Quality impact, level of significance changed from LTS to S to correctly reflect the text of the DEIR: ~~LTSS~~

Section 3.3, Air Quality

Corrected a typo by adding the correct letter to Mitigation Measure AQ-3b on page 3.3-22 as follows:

Mitigation Measure AQ-3**b**:- Discovery of Naturally Occurring Asbestos during Construction

Section 3.4, Biological Resources

Added information on the availability of mitigation through the PCCP, which was permitted after the publication of the Draft EIR, as follows:

On page 3.4-44, make the following changes at the end of the discussion of Impact BIO-2:

Applicants for projects subject to coverage under the PCCP HCP/NCCP would apply to the County for PCCP authorization. PCCP authorization and compliance with the conditions of that authorization would reduce the impacts of such projects on species or resources covered by the HCP/NCCP to a less than significant level. For non-covered species or resources, or for projects that are not covered activities under the PCCP, implementation of the following mitigation measures would reduce potentially significant impacts on special-status wildlife to a *less than significant* level.

On page 3.4-47, make the following changes in the discussion of Impact BIO-3:

Applicants for projects subject to coverage under the PCCP HCP/NCCP would apply to the County for PCCP authorization. PCCP authorization and compliance with the conditions of that authorization would reduce the impacts of such projects on species or resources covered by the HCP/NCCP to a less than significant level. For non-covered species or resources, or for projects that are not covered activities under the PCCP, As part of the required LSAA permit from CDFW, compensatory mitigation for loss of riparian habitat would be required.

On pages 3.4-48 and 3.4-49, make the following changes at the end of the discussion of Impact BIO-4:

Applicants for projects subject to coverage under the PCCP HCP/NCCP would apply to the County for PCCP authorization. PCCP authorization and compliance with the conditions of that authorization would reduce the impacts of such projects on species or resources covered by the HCP/NCCP to a less than significant level. For non-covered species or resources, or for projects that are not covered activities under the PCCP, implementation of the following mitigation measure for impacts on oak woodland habitat would reduce this impact to a *less than significant* level.

On page 3.4-50, make the following changes in the discussion of Impact BIO-5:

Applicants for projects subject to coverage under the PCCP HCP/NCCP, including the CARP, would apply to the County for PCCP authorization. PCCP authorization and compliance with the conditions of that authorization would reduce the impacts of such projects affected waters covered by the HCP/NCCP to a less than significant level. For non-covered resources, or for projects that are not covered activities under the PCCP, As part of the required CWA

Sections 401 and 404 permits from the State Water Board and USACE, compensatory mitigation for loss of wetlands and non-wetland waters could be required.

Section 3.10, Hydrology and Water Quality

Added Sugar Pine Reservoir to the list of reservoirs in the Upper American River watershed on page 3.10-8:

The Upper American River watershed contains 2,623 km². The Upper American River watershed originates at the crest of the Sierra Nevada just west of Lake Tahoe, within the Tahoe and Eldorado National Forest boundaries. The Upper American River has three forks: North, Middle, and South. Major streams in the watershed are the Rubicon River, Duncan Creek, Long Canyon Creek, and Silver Creek. The main reservoirs and lakes in the watershed include **Sugar Pine**, French Meadows, Hell Hole, Union Valley, Ice House, Lake Valley, Loon Lake, Silver Lake, Slab Creek, and Stumpy Meadows. The North Fork American River originates in eastern Placer County and flows west. It receives the Middle Fork American River 4 miles below the North Fork Reservoir Dam near the town of Auburn. Placer County Water Agency owns five hydroelectric plants on the Middle Fork American River (Sacramento River Watershed Program n.d.[c]).

Section 3.15, Public Services, Recreation, and Utilities and Service Systems

Table 3.15-1 is revised to include the Foresthill Public Utilities District:

Table 3.15-1. Water Districts Serving Placer County

Water District	Location in County
Foresthill Public Utilities District	Community of Foresthill

Corrections to the wastewater treatment discussion on page 3-15-13 are made as follows:

Wastewater Treatment

Placer County Department of Public Works operates and manages the ~~eight~~**nine** sewer systems serving unincorporated county areas. These ~~eight~~**nine** sewer systems include three sewer maintenance districts and ~~six~~**four** county service areas, all of which are funded by customer fees. These ~~eight~~**nine** facilities form a collective network of nearly 300 miles of sewer pipe and are listed in Table 3.15-2. The county's sewer system and wastewater treatment network also includes one wastewater treatment facility, **one community septic system**, 44 sewer pump stations, and more than 500 septic tank effluent pump systems (Placer County n.d.[b]).

Table 3.15-2. Sewer Districts Serving Placer County

Sewer Facility District	Facility Type	Facility Location
Sewer Maintenance District 1	SMD	North Auburn
Sewer Maintenance District 2	SMD	Granite Bay
Sewer Maintenance District 3	SMD	Horseshoe Bar/Folsom Lake
County Service Area 28, Zone 2A3	CSA	Rocklin
County Service Area 28, Zone 6	CSA	Sheridan
County Service Area 28, Zone 23	CSA	Blue Canyon
County Service Area 28, Zone 55	CSA	Citrus Heights
County Service Area 28, Zone 173	CSA	Roseville
County Service Area 28, Zone 232	CSA	Roseville
Source: Placer County 2009		
CSA = county service area		
SMD = sewer maintenance district		

The County's one WWTP is located in Sheridan **and the community septic system is located in the Blue Canyon area**. Other wastewater treatment facilities that treat County sewage include Roseville Pleasant Grove Regional WWTP, Sacramento Regional WWTP, Roseville Dry Creek Regional WWTP, **Lincoln Regional WWTRF**, and Tahoe City PUD & Truckee Tahoe Sanitary Authority (Placer County 2009; Placer County n.d.[a]).

Text explaining the presence of additional fire protection services has been added under Fire Protection Services on page 3.15-16 as follows:

Placer County Fire operates out of 14 total stations (eight full-time stations and six volunteer stations). All stations are listed below in Table 3.15-3. **In addition to County fire stations, other fire protection services in the County are operated by Special Districts or volunteers. Examples include fire stations operating in the Tahoe area (e.g., North Star, Squaw Valley, Alpine Meadows). The cities of Meadow Vista, Foresthill, Newcastle, and Penryn have their own fire departments.**

Chapter 5, Other CEQA Considerations

Corrected a typo by changing the numbering of and reference to Mitigation Measure AES-2 to AES-4 page 5-3 as follows:

Implementation of Mitigation Measure AES-~~24~~ would ensure that the project's contribution to cumulative aesthetic, light, and glare impacts would be less than cumulatively considerable with mitigation.

Chapter 4

DRAFT Final Mitigation Monitoring and Reporting Program

Introduction

Section 21081.6 of the California Environmental Quality Act (CEQA) and Section 15097 of the State CEQA Guidelines require a lead agency that adopts an environmental impact report (EIR) to establish a program to monitor and report on the adopted mitigation measures in order to ensure that approved mitigation measures are implemented subsequent to project approval. Specifically, the lead agency must adopt a reporting or monitoring program for mitigation measures incorporated into a project or imposed as conditions of approval. The program must be designed to ensure compliance during project implementation. As stated in California Public Resources Code Section 21081.6(a)(1):

The public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation. For those changes which have been required or incorporated into the project at the request of a responsible agency or a public agency having jurisdiction by law over natural resources affected by the project, that agency shall, if so requested by the lead agency or a responsible agency, prepare and submit a proposed reporting or monitoring program.

This mitigation monitoring and reporting program (MMRP) is designed to meet that requirement. As lead agency for this project, Placer County will use this MMRP to ensure compliance with mitigation measures associated with implementation of the proposed project. Mitigation measures identified in this MMRP were developed in the EIR prepared for the proposed project. The MMRP will provide for monitoring of implementation of mitigation measures.

The following table indicates the mitigation measure number, the mitigation measure text, implementation timing, the monitoring agency, and an area to record monitoring compliance.

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Draft Final Mitigation Monitoring and Reporting Program

Proposed Mitigation Measure(s)	Incorporation into Project	Timing	Implementing Party	Monitoring	Verification of Completion	
					Date	Initial
Aesthetics						
Mitigation Measure AES-4: Implement Lighting Plan A lighting plan will be developed for individual projects that are located on underdeveloped parcels in areas that are surrounded by limited urban development. The lighting plan will be submitted to the Development Review Committee for review and approval. The lighting plan will include a detailed lighting and photometric plan that: <ul style="list-style-type: none">• Demonstrates compliance with the lighting requirements outlined in the Design Manual. This includes minimizing impacts on adjoining and nearby land uses.• Streetlights will not exceed the minimum number required by the County unless otherwise approved by the DRC. Parking lots would be lit, but would allow gaps in lighting.• Includes the type of lighting fixtures proposed in parking areas (as needed for additional housing developments), including pole height. All site lighting in parking lots will be full cut-off design. The metal pole color will be such that the pole blends into the landscape (i.e., black, bronze, or dark bronze).• Includes building lighting that is shielded and directed downward, such that the bulb or ballast is not visible. Lighting fixture design will complement the building colors and materials and will be used to light entries, soffits, covered walkways and pedestrian areas such as plazas. Roof and wall pack lighting will not be used. Lighting intensity will be of a level that only highlights the adjacent building area and ground area and will not impose glare on any pedestrian or vehicular traffic.• Includes landscape lighting that will not impose glare on any pedestrian or vehicular traffic.	lighting plans will be required as a part of development applications and reviewed as a part of application review	at the time of application for a permit	Project Applicant/County of Placer, Planning Services Division	Reviewing Party County of Placer, Planning Services Division Monitoring Action Review lighting plans for consistency with the Design Manual		
Air Quality						
Mitigation Measure AQ-2: Installation of Electric Appliances in New Construction Require the installation of only electric appliances in future residential construction associated with the proposed project. Future residential units will have no wood-burning or natural gas fireplaces or stoves.	to be included in conditions of approval for projects	at the time of application for a permit	County of Placer, Planning Services Division	Reviewing Party County of Placer, Planning Services Division Monitoring Action to come		
Mitigation Measure AQ-3a: Compliance with PCAPCD Recommended Construction Mitigation Measures To control emissions of criteria air pollutants during construction, the project proponent/operator and/or its contractor(s) will implement the following measures during construction of the proposed residential units, subject to verification by the County: <ul style="list-style-type: none">• Maintain all construction equipment properly according to manufacturer’s specifications.• Fuel all off-road and portable diesel-powered equipment with CARB certified motor vehicle diesel fuel (non-taxed version suitable for use off-road).• Comply with the State Off-Road Regulation by using diesel construction equipment meeting CARB's Tier 2 certified engines or cleaner off-road heavy-duty diesel engines.• Comply with the State On-Road Regulation by using on-road heavy-duty trucks that meet the CARB’s Tier 3 standard for on-road heavy-duty diesel engines.• All on and off-road diesel equipment shall not idle for more than 5 minutes. Signs shall be posted in the designated queuing areas and/or job sites to remind drivers and operators of the 5-minute idling limit.• Diesel idling within 1,000 feet of sensitive receptors is not permitted.• Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors.• Use Electrified equipment when feasible.• Substitute gasoline-powered in place of diesel-powered equipment, where feasible.• Use alternatively fueled construction equipment on-site where feasible, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane or biodiesel.• Require contractors to repower equipment with the cleanest engines available.	to be included in conditions of approval for projects	prior to and during project construction	Project Applicant/County of Placer, Planning Services Division	Reviewing Party County of Placer , Planning Services Division Monitoring Action County to verify incorporation of measure in permit documentation and plans and during inspections required for permits		

Proposed Mitigation Measure(s)	Incorporation into Project	Timing	Implementing Party	Monitoring	Verification of Completion	
					Date	Initial
<ul style="list-style-type: none">Require construction equipment use installed California Verified Diesel Emission Control Strategies. These strategies are listed at: http://www.arb.ca.gov/diesel/verdev/vt/cvt.htmRequire the contractor to prepare a dust control plan when the disturbed area is more than one (1) acre.Reduce the amount of the disturbed area where possible.Use water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site. Increased watering frequency is required whenever wind speeds exceed 15 mph. Reclaimed (non-potable) water should be used whenever possible.All dirt stock-pile areas should be sprayed daily as needed.All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible, with building pads laid as soon as possible after grading unless seeding or soil binders are used.						
<p>Mitigation Measure AQ-3b: Discovery of Naturally Occurring Asbestos during Construction</p> <p>During construction activity, if NOA, serpentine, or ultramafic rock is discovered by the owner/operator and an ADMP has not been submitted, the following measures shall be implemented. For additional information, visit the PCAPCD’s website at https://www.placer.ca.gov/1621/NOA-Construction-Grading.</p> <ul style="list-style-type: none">When the construction area is equal to or greater than 1 acre, the applicant will prepare an ADMP and obtain approval by the PCAPCD within 14 days of the discovery of NOA, serpentine, or ultramafic rock. The applicant will contact the PCAPCD before retaining a qualified state registered geologist to conduct initial geologic evaluations as part of the ADMP application processMaintain the dust mitigation measures until the provisions of the PCAPCD-approved ADMP plan are implementedImplement the provisions of the PCAPCD-approved ADMP within 14 days of its approvalMaintain the provisions of the PCAPCD-approved ADMP throughout the remainder of the construction or grading activityEach subsequent individual lot developer will prepare an ADMP when the construction area is equal to or greater than 1 acre <p>The project developer and each subsequent lot seller must disclose the presence of ultramafic rock, serpentine, or NOA during any subsequent real estate transaction processes. The disclosure must include a copy of the CARB pamphlet entitled “Asbestos-Containing Rock and Soil—What California Homeowners and Renters Need to Know,” or other similar fact sheets which may be found on the PCAPCD’s website (Placer County Air Pollution Control District 2020c).</p>	to be included in conditions of approval for projects	prior to and during project construction	Project Applicant/PCAPCD	<p>Reviewing Party</p> <p>PCAPCD</p> <p>Monitoring Action</p> <p>PCAPCD to verify incorporation of measure in permit documentation and plans and during inspections required for permits</p>		
Biological Resources						
<p>Mitigation Measure BIO-1a: Identify and Document Special-Status Plant Populations</p> <p>For proposed development in previously undeveloped areas, prior to design or construction, the County will require documentation of the presence or absence of special-status plant populations. A qualified botanist will be retained to survey the affected area before project design and construction. To document special-status plant populations, the following steps will be undertaken before construction. At any point during implementation of this mitigation measure, a proposed project may be re-designed or modified to avoid direct and indirect impacts on special-status plants, and will not need to complete the remaining steps identified in this mitigation measure.</p> <ul style="list-style-type: none">Review Existing Information. The botanist will review existing information to develop a list of special-status plants that could grow within the affected area. Sources of information consulted will include the CNDDDB; USFWS list of endangered, threatened, and proposed species for the project region; previously prepared environmental documents; City and County general plans; HCPs; and the CNPS inventory.Conduct Field Surveys. The botanist will evaluate existing habitat conditions in each affected area and determine what level of botanical surveys may be required. The type of botanical survey will depend on species richness, habitat type and quality, and the probability of special-status species occurring in a particular habitat type.	to be included in conditions of approval for projects	prior to and during project construction	Project Applicant/County of Placer, Planning Services Division	<p>Reviewing Party</p> <p>County of Placer, Planning Services Division</p> <p>Monitoring Action</p> <p>County to verify incorporation of measure in permit documentation and plans and during inspections required for permits</p>		

Proposed Mitigation Measure(s)	Incorporation into Project	Timing	Implementing Party	Monitoring	Verification of Completion	
					Date	Initial
<p>Depending on these factors and the proposed extent of construction, one or both of the following levels of survey will be required:</p> <ul style="list-style-type: none">◦ Habitat Assessment. A habitat assessment determines whether suitable habitat is present. This type of assessment can be conducted at any time of year and is used to assess and characterize habitat conditions and determine whether return surveys are necessary. If no suitable habitat is present, no additional surveys will be required.◦ Floristic Protocol-Level Surveys. Floristic surveys that follow the CDFW protocols for surveying native plant species (California Department of Fish and Wildlife 2018) will be conducted in areas that are relatively undisturbed or have moderate to high potential to support multiple special-status plants. The CDFW Survey Guidelines require that all species be identified to the level necessary to determine whether they qualify as special-status plants. The guidelines also require that field surveys be conducted when special-status plants that could occur in the area are evident and identifiable. To account for different special-status plant identification periods, one or more series of field surveys may be required in spring and summer. <ul style="list-style-type: none">• Document Survey Results. If special-status plants are found during the field survey, they will be mapped and documented, Mitigation Measure BIO-1b will be implemented in conjunction with this mitigation measure to avoid or minimize significant impacts on special-status plants.						
<p>Mitigation Measure BIO-1b: Avoid or Minimize Impacts on Special-Status Plant Populations</p> <p>Where development in an affected area would have potential to result in direct loss or indirect disturbance to special-status plants, the following measures to avoid or minimize impacts on special-status plants will be implemented:</p> <ul style="list-style-type: none">• Redesign or modify the proposed development during future site design to avoid direct and indirect impacts on special-status plants, if feasible.• During construction, protect special-status plants by installing environmentally sensitive area fencing (orange construction barrier fencing) around special-status plant populations. The environmentally sensitive area fencing will be installed at least 20 feet from the edge of the population. The location of the fencing will be marked in the field with stakes and flagging and shown on the construction drawings. The construction specifications will contain clear language that prohibits construction related activities, vehicle operation, material and equipment storage, and other surface-disturbing activities within the fenced environmentally sensitive area.• If population avoidance is not possible, coordinate with the appropriate resource agencies and local experts to determine whether transplantation is feasible. If the agencies concur that transplantation is a feasible mitigation measure, the botanist will develop and implement a transplantation plan through coordination with the appropriate agencies. The special-status plant transplantation plan will involve identifying a suitable transplant site; moving the plant material and seed bank to the transplant site; collecting seed material and propagating it in a nursery; and monitoring the transplant sites to document recruitment and survival rates. <p>If transplantation of special-status plants is not feasible, the effects of the project on special-status plants will be compensated for by offsite preservation at a ratio to be negotiated with the resource agencies. Suitable habitat for affected special status–plant species will be purchased in a conservation area, preserved, and managed in perpetuity. Detailed information will be provided to the agencies on the location and quality of the preservation area, the feasibility of protecting and managing the area in perpetuity, and the responsible parties. Other pertinent information also will be provided, to be determined through future coordination with the resource agencies.</p>						
<p>Mitigation Measure BIO-2a: Document Special-Status Wildlife Species and Their Habitats</p> <p>Prior to design or construction for future development in previously undeveloped areas, the County will require documentation of the presence or absence of special-status wildlife populations or suitable habitat for these species. A qualified wildlife biologist will be retained to survey the affected area before project design and construction. To document special-status wildlife and habitats, the following steps will be undertaken before construction. At any point during implementation of this mitigation measure, a proposed project may be re-designed or modified to avoid direct and indirect impacts on special-status wildlife, and will not need to complete the remaining steps identified in this mitigation measure.</p>	to be included in conditions of approval for projects	Prior to and during project construction	Project Applicant/ County of Placer, Planning Services Division	<p>Reviewing Party</p> <p>County of Placer, Planning Services Division</p> <p>Monitoring Action</p> <p>County to verify incorporation of measure in permit documentation and plans and during inspections required for permits</p>		

Proposed Mitigation Measure(s)	Incorporation into Project	Timing	Implementing Party	Monitoring	Verification of Completion	
					Date	Initial
<ul style="list-style-type: none">Review Existing Information. The wildlife biologist will review existing information to develop a list of special-status wildlife species that could occur in the affected area. The following information will be reviewed as part of this process: the USFWS IPaC species list for the affected area, CNDDDB occurrences within the vicinity of the affected area, NMFS species lists, previously prepared environmental documents, City and County general plans, PCCP, and USFWS-issued biological opinions for previous projects in the vicinity of the affected area.Coordinate with State and Federal Agencies, as Necessary. The wildlife biologist will coordinate with the County and appropriate agencies (CDFW, USFWS, NMFS), as necessary, to discuss wildlife resource issues in the region and determine the appropriate level of surveys necessary to document special-status wildlife and their habitats.Conduct Field Studies. The wildlife biologist will evaluate existing habitat conditions and determine what level of biological surveys may be required. The type of survey required will depend on species richness, habitat type and quality, and the probability of special-status species occurring in habitat types present in the affected area. Depending on the existing conditions in the area and the proposed construction activity, one or more of the following levels of survey may be required:<ul style="list-style-type: none">Habitat Assessment. A habitat assessment determines whether suitable habitat is present. This type of assessment can be conducted at any time of year and is used to assess and characterize habitat conditions and to determine whether return surveys are necessary. If no suitable habitat is present, no additional surveys will be required.Species-Focused Surveys. Species-focused surveys (or target species surveys) will be conducted if suitable habitat is present for special-status wildlife and if it is necessary to determine the presence or absence of the species in the affected area or immediate vicinity. The surveys will focus on special-status wildlife species that have the potential to occur in the affected area (Table 3.4-3). The surveys will be conducted during a period when the target species are present and/or active.Protocol-Level Wildlife Surveys. The County will require compliance with protocols and guidelines issued by responsible agencies for certain special-status species. USFWS and CDFW have issued survey protocols and guidelines for several special-status wildlife species that could occur in the affected areas, including valley elderberry longhorn beetle, California red-legged frog, foothill yellow-legged frog, Sierra Nevada yellow-legged frog, California spotted owl, northern goshawk, and great grey owl. In some cases, the County may choose to require the assumption of the presence of a species rather than conduct a protocol-level survey. The protocols and guidelines may require that surveys be conducted during a particular time of year or time of day when the species is present and active. Many survey protocols require that only a USFWS- or CDFW-approved biologist perform the surveys. Because some species can be difficult to detect or observe, multiple field techniques may be used during a survey period and additional surveys may be required in subsequent seasons or years as outlined in the protocol or guidelines for each species. <p>Special-status wildlife or suitable habitat identified during the field surveys will be mapped and documented. If surveys determine that special-status wildlife species are present or assumed to be present in or near the affected area, the County will require implementation of Mitigation Measure BIO-2b to avoid or minimize significant impacts on special-status wildlife.</p>						
Mitigation Measure BIO-2b: Avoid and Minimize Impacts on Special-Status Wildlife Species through Redesign, Protection, or Monitoring						
Where development in an affected area would have potential to result in direct or indirect loss or disturbance to special-status wildlife, the County will implement the following measures to avoid or minimize impacts on special-status wildlife:						
<ul style="list-style-type: none">Redesign or modify program elements to avoid direct and indirect impacts on special-status wildlife or their habitats, if feasible.During ground-disturbing construction activities, protect special-status wildlife and their habitats by installing environmentally sensitive area fencing or staking around habitat features, such as wetlands, streams, burrows, and/or active nests. The environmentally sensitive area fencing or staking will be installed at a minimum distance from the edge of the resource as determined by a qualified biologists and through coordination with state and federal agency biologists (USFWS and CDFW), as applicable. The location of the fencing will be marked in the field						

Proposed Mitigation Measure(s)	Incorporation into Project	Timing	Implementing Party	Monitoring	Verification of Completion	
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<div><div>with stakes and flagging and shown on the construction drawings. The construction specifications will contain clear language that prohibits construction-related activities, vehicle operation, material and equipment storage, and other surface-disturbing activities within the fenced environmentally sensitive area.</div><div><div>• Restrict construction-related activities to the non-breeding season for special-status wildlife species that could occur in the affected area. Timing restrictions may vary depending on the species and could occur during any time of the year.</div><div>• Coordinate with the appropriate resource agencies to determine whether a monitoring plan for special-status wildlife is necessary during construction. If a monitoring plan is required, it will be developed and implemented in coordination with appropriate agencies and will include:<div><div>◦ A description of each of the wildlife species and suitable habitat for species that could occur in the affected area</div><div>◦ The location and size of no-disturbance zones in and adjacent to environmentally sensitive areas for wildlife</div><div>◦ Directions on the handling and relocating of special-status wildlife species found on the site that are in immediate danger of being injured or killed</div><div>◦ Notification and reporting requirements for special-status species that are identified in the affected area</div></div></div></div></div>						
Mitigation Measure BIO-2c: Coordinate with Resource Agencies and Develop Appropriate Compensation Plans						
<div>In the event that, despite implementation of Mitigation Measure BIO-2b: Avoid and Minimize Impacts on Special-Status Wildlife Species through Redesign, Protection, or Monitoring, construction activities would result in significant impacts on state- or federally listed wildlife species, the County will require development of a compensation plan in coordination with the appropriate resource agency (CDFW, USFWS, NMFS), and/or their compensation guidelines followed, to reduce the impact to a less-than-significant level. The amount of compensation will vary depending on the amount of habitat loss or degree of habitat disturbance anticipated. The compensation plan will be developed and implemented in coordination with the appropriate state or federal agency and compensatory mitigation would be accomplished through one or a combination of the following options.</div> <div><div>• Purchase the appropriate number and type of habitat credits at a USFWS and/or CDFW-approved mitigation bank or conservation area.</div><div>• Establish a conservation easement on a parcel(s) containing a sufficient amount of preserved or restored habitat and adaptively mange the mitigation lands consistent with the most current information on the species habitat requirements.</div><div>• Mitigate through an approved habitat conservation plan (i.e., PCCP) by contributing applicable mitigation fees based on the special-status wildlife habitat type that is affected by the project.</div></div> <div><div>If the PCCP is the permitting mechanism used to address impacts associated with listed species and their habitats, waters of the State, and waters of the U.S., the PCCP’s mitigation fees and conditions on covered activities may be used to address this resource impact and avoidance minimization measures as set forth in the PCCP implementation document to the extent compliance with the PCCP provides equal or greater mitigation or reduction in the significance of impacts. If PCCP enrollment is chosen and/or required by the State and federal agencies as mitigation for one or more biological resource area impacts, then the PCCP avoidance, minimization, and mitigation measures shall apply to those species, habitat types, and waters that are covered by the PCCP.</div><div>As applicable, compensatory mitigation for special-status wildlife species would be coordinated with compensatory mitigation for other local, state and federally regulated habitats, such as waters of the United States, riparian, and oak woodlands.</div></div>						

Proposed Mitigation Measure(s)	Incorporation into Project	Timing	Implementing Party	Monitoring	Verification of Completion	
					Date	Initial
<p>Mitigation Measure BIO-3a: Avoid and minimize disturbance of riparian habitats</p> <p>To the extent possible, the County will require avoidance of impacts on riparian habitats by implementing the following measures:</p> <ul style="list-style-type: none">• Redesign or modify the proposed development to avoid direct and indirect impacts on riparian habitats, if feasible.• Protect riparian habitats that occur near the project site by installing environmentally sensitive area fencing at least 20 feet from the edge of the riparian vegetation, if feasible. Depending on site-specific conditions, this buffer may be narrower or wider than 20 feet. The location of the fencing will be marked in the field with stakes and flagging and shown on the construction drawings. The construction specifications will contain clear language that prohibits construction-related activities, vehicle operation, material and equipment storage, and other surface-disturbing activities within the fenced environmentally sensitive area.• Minimize the potential for long-term loss of riparian vegetation by trimming vegetation, rather than removing the entire shrub. Shrub vegetation will be cut at least 1 foot above ground level to leave the root systems intact and allow for more-rapid regeneration of the species. Cutting will be limited to a minimum area necessary within the construction zone.	to be included in conditions of approval for projects	prior to and during project construction	Project Applicant/ County of Placer, Planning Services Division	<p>Reviewing Party</p> <p>County of Placer, Planning Services Division</p> <p>Monitoring Action</p> <p>County to verify incorporation of measure in permit documentation and plans and during inspections required for permits</p>		
Mitigation Measure BIO-3b: Compensate for the Loss of Riparian Habitat						
<p>If riparian habitat is removed as part of future development associated with project implementation, the County will require compensation for the loss of riparian vegetation to ensure no net loss of habitat functions and values. Compensation ratios will be based on site-specific information and determined through coordination with state and federal agencies (including CDFW, USFWS, USACE, and NMFS). Compensation will be provided at a minimum 1:1 ratio (1 acre restored or created for every 1 acre removed) and may be a combination of onsite restoration/creation, offsite restoration, and mitigation credits. The County will require the development of a restoration and monitoring plan that describes how riparian habitat will be enhanced or recreated and monitored over a minimum period of time, as determined by the appropriate state and federal agencies. The County will require implementation the restoration and monitoring plan.</p>						
<p>Mitigation Measure BIO-4a: Avoid and Minimize Disturbance of Oak Woodlands</p> <p>To the extent possible, the County will require avoidance of impacts on oak woodlands by implementing the following measures:</p> <ul style="list-style-type: none">• Redesign or modify the proposed development to avoid direct and indirect impacts on oak woodlands, if feasible.• Protect oak woodlands that occur near the project site by installing environmentally sensitive area fencing at least 20 feet from the edge of oak trees. Depending on site-specific conditions, this buffer may be narrower or wider than 20 feet. The location of the fencing will be marked in the field with stakes and flagging and shown on the construction drawings. The construction specifications will contain clear language that prohibits construction-related activities, vehicle operation, material and equipment storage, and other surface-disturbing activities within the fenced environmentally sensitive area.• Minimize the potential for long-term loss of woody vegetation by pruning vegetation rather than removing entire trees or shrubs in areas where complete removal is not required. Any trees or shrubs that need to be trimmed will be cut at least 1 foot above ground level to leave the root systems intact and allow for more rapid regeneration. Cutting will be limited to the minimum area necessary within the construction zone. To protect nesting birds, no pruning or removal of woody vegetation will be performed between February 1 and August 31 without pre-construction bird surveys conducted in accordance with CDFW and/or USFWS requirements.• Operation or parking of vehicles, digging, trenching, slope cuts, soil compaction, grading, paving, or placement of fill will be prohibited within at least 6 feet outside the driplines of retained trees.• All construction, staging (including vehicle parking), and access areas will be restricted to the direct impact areas.• Runoff from the development area will be directed in such a way as to prevent drainage into any adjacent open space area. Drainage systems will be designed to prevent runoff from flowing into oak woodlands and direct it into	to be included in conditions of approval for projects	prior to and during project construction	Project Applicant/ County of Placer, Planning Services Division	<p>Reviewing Party</p> <p>County of Placer, Planning Services Division</p> <p>Monitoring Action</p> <p>County shall verify incorporation of measure in permit documentation and plans. Verify that trimming, operations and run off comply with requirements</p>		

Proposed Mitigation Measure(s)	Incorporation into Project	Timing	Implementing Party	Monitoring	Verification of Completion	
					Date	Initial
a storm drainage system, which will discharge runoff into existing drainages. Retaining walls will be installed at the edge of development areas where fill is placed to avoid ponding of water around adjacent retained oak trees.						
Mitigation Measure BIO-4b: Compensate for the Loss of Oak Woodlands Where future development associated with implementation of the project would have potential to result in the loss of oak woodland, the County will require compensation for the loss of oak woodland to ensure no net loss of habitat functions and values. Compensation ratios will be based on site-specific information and determined through coordination with CDFW. Compensation will be provided at a minimum 1:1 ratio (1 acre restored or created for every 1 acre removed). Compensation for loss of oak woodlands can be accomplished using one or more of the following options: <ul style="list-style-type: none">• Offsite deed restriction or conservation easement acquisition and/or acquisition in fee title by a land conservation organization for purposes of off-site oak woodland conservation• In-lieu fee payment• Replacement planting onsite within an area subject to deed restriction or conservation easement• Replacement planting offsite within an area subject to a conservation easement• A combination of the options 1 through 4 In accordance with requirements of the California Public Resources Code Section 21083.4(b), replacement planting will not account for more than 50 percent of the oak woodland mitigation requirement. The replacement planting area must be suitable for tree planting, will not conflict with current or planned land uses, and will be large enough to accommodate replacement plantings at a density equal to the density of oak woodlands affected, up to a maximum density of 200 trees per acre. The County will require development a mitigation and monitoring plan that describes how replacement planting will be installed and monitored over a minimum period of time, as determined by CDFW. The County will require implementation of the restoration and monitoring plan. The remaining portion of the project’s oak woodland impact mitigation requirement would be implemented in the form of an in-lieu fee payment to the County.						
Mitigation Measure BIO-5a: Identify and Delineate Waters of the United States and Waters of the State Prior to design or construction of future projects resulting from implementation of the project, a qualified botanist will be retained to identify areas that could qualify as waters of the United States, including wetlands and non-wetland waters, and waters of the state, assuming such features exist in the affected area. Wetlands will be identified using both the current USACE and State Water Board definitions of wetlands and the current required methods, most likely the USACE Wetlands Delineation Manual (Environmental Laboratory 1987), Arid West or Western Mountains, Valleys, and Coast regional supplements (U.S. Army Corps of Engineers 2008, 2010). The jurisdictional boundary of non-wetland waters will be identified based on the ordinary high water mark (33 CFR § 328.3(e)) using current methods, most likely the Arid West and Western Mountains, Valleys, and Coast field guides (Lichvar and McColley 2008; Mersel and Lichvar 2014). This information will be mapped and documented as part of aquatic resources delineation reports according to current USACE minimum standards and mapping standards. Mitigation Measures BIO-5b and BIO-5c will be implemented as necessary to avoid, minimize, or compensate for impacts on waters of the United States and waters of the state.						
Mitigation Measure BIO-5b: Avoid and Minimize Disturbance of Waters of the United States and Waters of the State To the extent possible, the County will require avoidance and minimization of impacts on wetlands and non-wetland waters (creeks, streams, rivers, and canals) by implementing the following measures: <ul style="list-style-type: none">• Redesign or modify the proposed development to avoid direct and indirect impacts on wetland habitats, if feasible. For underground components, this may be accomplished through the use of trenchless installation methods (e.g., jack and bore).• Protect wetland habitats that occur near the project site by installing environmentally sensitive area fencing at least 20 feet from the edge of the wetland. Depending on site-specific conditions and permit requirements, this						
to be included in conditions of approval for projects		prior to and during project construction	Project Applicant/ County of Placer, Planning Services Division	Reviewing Party County of Placer, Planning Services Division, California Department of Fish and Wildlife, US Army Corp of Engineers Monitoring Action County shall verify incorporation of measure in permit documentation and plans and shall review and approve proof of purchase or Riparian Restoration and Monitoring Plan and Monitoring report, as appropriate		

Proposed Mitigation Measure(s)	Incorporation into Project	Timing	Implementing Party	Monitoring	Verification of Completion	
					Date	Initial
<p>buffer may be wider than 20 feet. The location of the fencing will be marked in the field with stakes and flagging and shown on the construction drawings. The construction specifications will contain clear language that prohibits construction-related activities, vehicle operation, material and equipment storage, and other surface-disturbing activities within the fenced environmentally sensitive area.</p> <ul style="list-style-type: none">• Avoid installation activities in saturated or ponded wetlands during the wet season (spring and winter) to the maximum extent possible. Where such activities are unavoidable, protective practices, such as use of padding or vehicles with balloon tires, will be used.• Where determined necessary by resource specialists, use geotextile cushions and other materials (e.g., timber pads, prefabricated equipment pads, or geotextile fabric) in saturated conditions to minimize damage to the substrate and vegetation.• Stabilize exposed slopes and streambanks immediately on completion of installation activities. Non-wetland waters will be restored in a manner that encourages vegetation to re establish to its pre-construction condition and that reduces the effects of erosion on the drainage system.• In highly erodible stream systems, stabilize banks using a non vegetative material that will bind the soil initially and break down within a few years. If the project engineers determine that more aggressive erosion control treatments are needed, use geotextile mats, excelsior blankets, or other soil stabilization products.• During construction, remove trees, shrubs, debris, or soils that are inadvertently deposited below the ordinary high water mark of drainages in a manner that minimizes disturbance of the drainage bed and bank. <p>These measures will be incorporated into contract specifications and implemented by the project contractor. In addition, the County will ensure that the contractor incorporates all permit conditions into construction specifications.</p>						
<p>Mitigation Measure BIO-5c: Compensate for the Loss of Wetlands and Non-wetland Waters of the United States and Waters of the State</p> <ul style="list-style-type: none">• Where development associated with project implementation would have potential to result in the loss of wetlands or non-wetland waters of the United States or waters of the state, the County will require compensation for the loss of wetlands and/or non-wetland waters to ensure no net loss of habitat functions and values. Compensation ratios will be based on site-specific information and determined through coordination with state and federal agencies, including USACE and the Regional Water Board. The compensation will be at a minimum 1:1 ratio (1 acre restored or created for every 1 acre filled) and may be a combination of onsite restoration/creation, offsite restoration, and mitigation credits. A restoration and monitoring plan will be developed and implemented that describes how wetlands and non-wetland waters will be restored or created and monitored over a minimum period of time.						
<p>Mitigation Measure BIO-6: Avoid the Dispersal of Invasive Plants into Uninfested Areas</p> <p>During the evaluation of biological resources on parcels prior to development, a qualified biologist will determine whether invasive plant species present a risk to native plants on the site and whether they could displace native plants. If invasive plant species are present, and to avoid the introduction or spread of invasive plants into uninfested areas, the County will require the incorporation of the following measures into construction project plans and specifications:</p> <ul style="list-style-type: none">• Use certified, weed-free, imported erosion-control materials (or rice straw in upland areas).• Educate construction supervisors and managers about weed identification and the importance of controlling and preventing the spread of invasive plants.• The invasive plant avoidance measures will be reflected in contract documents and implemented by the construction contractor.	to be included in conditions of approval for projects	prior to, during, and following project construction-related activities	Project Applicant/ Contractor/ Qualified Biologist/County of Placer, Planning Services Division	<p>Reviewing Party</p> <p>County of Placer, Planning Services Division, California Department of Fish and Wildlife, US Army Corp of Engineers</p> <p>Monitoring Action</p> <p>County shall verify incorporation of measure in permit documentation and plans and shall review and approve contract specifications provided by applicant prior to project construction.</p> <p>County shall verify periodically during and after project activities that avoidance and minimization</p>		

Proposed Mitigation Measure(s)	Incorporation into Project	Timing	Implementing Party	Monitoring	Verification of Completion	
					Date	Initial
				measures are properly implemented		
Cultural Resources						
<p>Mitigation Measure CUL-2: Implement Avoidance Measures to Avoid Direct or Indirect Impacts on Archaeological Resources</p> <p>If a previously unknown archaeological resource were encountered during construction activity, implementation of inadvertent discovery procedures, as are provided below will help minimize or eliminate direct or indirect impacts on archaeological resources.</p> <p>If cultural resources are discovered during project-related ground disturbance, all ground-disturbing activities will immediately stop within 100 feet (30 meters) of the discovery, the location of the discovery will be marked for avoidance, and efforts will be made to prevent inadvertent destruction of the find. The contractor must notify the County. The County will evaluate the resource to determine whether it is a historical resource or unique archaeological resource under CEQA. If the County determines that the discovery is not a historical resource, the discovery will be documented, and construction may proceed at the direction of the County.</p> <p>Treatment will be implemented where necessary to resolve significant effects on inadvertently discovered California Register–eligible cultural resources. The County will consider preservation in place as the preferred mitigation, as required under CEQA Guidelines Section 15126.4(b), for all California Register–eligible resources and non-eligible resources that would be subject to significant effects; the County will prepare a discussion that documents the basis for the selection of treatment consistent with this section.</p>	to be included in conditions of approval for projects	prior to construction	Project Applicant/ Qualified Archaeologist/County of Placer, Planning Services Division	<p>Reviewing Party</p> <p>County of Placer, Planning Services Division /SHPO/ US Army Corp of Engineers</p> <p>Monitoring Action</p> <p>County shall verify incorporation of measure in permit documentation and plans and review and approved treatment plan prior to issuance of building or grading permit</p>		
<p>Mitigation Measure CUL-3: Implement Human Remains Discovery Procedures</p> <p>If human remains are discovered during project implementation, work will cease in the immediate vicinity and within 100 feet of the find to avoid further disturbance. The County will coordinate with the Placer County Coroner to make determinations and perform the management steps prescribed in California Health and Safety Code Section 7050.5 and PRC Section 5097.98. This coordination requires the following steps:</p> <ul style="list-style-type: none">• Once notified by the County, the coroner will determine if an investigation regarding the cause of death is required.• If the coroner determines that the remains are of prehistoric Native American origin, the coroner will then notify the NAHC.• The NAHC will designate and contact the most likely descendant, who must make recommendations for treatment of the remains within 48 hours from completion of the commission’s examination of the finds.• If the NAHC fails to identify a most likely descendant or if the parties cannot reach agreement as to how to reinter the remains, as described in PRC Section 5097.98(e), the landowner will reinter the remains at a location not subject to further disturbance. <p>If the remains are found not to be Native American in origin and do not appear to be in an archaeological context, ground disturbance will proceed at the direction of the coroner and the County.</p>	to be included in conditions of approval for projects	during construction	Project Applicant/ Qualified Archaeologist/County of Placer, Planning Services Division	<p>Reviewing Party</p> <p>County of Placer, Planning Services Division</p> <p>Monitoring Action</p> <p>County to verify incorporation of measure in permit documentation and plans and during inspections required for permits</p>		
Energy						
<p>Mitigation Measure EN-1a: Construction Best Management Practices</p> <p>During construction of the residential units, the County will require the contractor to incorporate BMPs to reduce the inefficient use of energy, as applicable. BMPs may include but are not limited to the following.</p> <ul style="list-style-type: none">• Use of local building materials.• Recycling construction waste.• Implementing employee carpool programs.• Maintaining all construction equipment in proper working condition according to manufacturer’s specifications. The equipment must be checked by a certified mechanic and be determined to be running in proper condition before it is operated.	to be included in conditions of approval for projects	prior to project construction and during design phase	Project Applicant/ Qualified Engineer/County of Placer, Planning Services Division	<p>Reviewing Party</p> <p>County of Placer, Planning Services Division</p> <p>Monitoring Action</p> <p>County to verify incorporation of measure in permit documentation and plans and during inspections required for permits</p>		

Proposed Mitigation Measure(s)	Incorporation into Project	Timing	Implementing Party	Monitoring	Verification of Completion	
					Date	Initial
Mitigation Measure EN-1b: Comply with Energy Efficiency Measures in the Placer County General Plan (2013) and Placer County Sustainability Plan (2020)						
Prior to approval of the final design plans for development under the proposed project, the County will require the contractor to list all the energy-efficiency measures that will be implemented and demonstrate in the plans where these measures will be located.						
The following is a list of proposed sustainability measures from the County’s General Plan, and PCSP that will be required for project approval.						
<ul style="list-style-type: none">• Reduce building energy consumption through one or more of the following methods, where feasible.<ul style="list-style-type: none">◦ Incorporate energy efficiency design features that exceed 2019 Title 24 California Energy Efficiency Standards by at least 15 percent.◦ Prioritize use of electricity as the primary energy source in new developments.◦ Implement CALGreen Tier 1 standards.◦ Use of zero net energy design in new developments, where feasible.• Orient development for solar access, to the extent practicable.• Implement onsite renewable energy on new buildings, where feasible.• Prioritize development that is within proximity of non-auto public transit.						
Use native, drought-tolerant plantings in landscaping.						
Mitigation Measure EN-1b: Comply with Energy Efficiency Measures in the Placer County General Plan (2013) and Placer County Sustainability Plan (2020)						
Geology, Soils, Minerals, and Paleontological Resources						
Mitigation Measures GEO-2: Obtain Approval from Engineering and Surveying Division						
<ul style="list-style-type: none">• The applicant will prepare and submit Improvement Plans, specifications and cost estimates (per the requirements of Section II of the Land Development Manual (LDM) that are in effect at the time of submittal) to the Engineering and Surveying Division (ESD) for review and approval. The plans will show all physical improvements as required by the conditions for the project as well as pertinent topographical features both on and off site. All existing and proposed utilities and easements, on site and adjacent to the project, which may be affected by planned construction, will be shown on the plans. All landscaping and irrigation facilities within the public right-of-way (or public easements), or landscaping within sight distance areas at intersections, will be included in the Improvement Plans. The applicant will pay plan check and inspection fees and, if applicable, Placer County Fire Department improvement plan review and inspection fees with the 1st Improvement Plan submittal. (NOTE: Prior to plan approval, all applicable recording and reproduction costs will be paid). The cost of the above-noted landscape and irrigation facilities will be included in the estimates used to determine these fees. It is the applicant's responsibility to obtain all required agency signatures on the plans and to secure department approvals. If the Design/Site Review process and/or Development Review Committee (DRC) review is required as a condition of approval for the project, said review process will be completed prior to submittal of Improvement Plans.						
Conceptual landscape plans submitted prior to project approval may require modification during the Improvement Plan process to resolve issues of drainage and traffic safety.						
The Final Map(s) will not be submitted to the ESD until the Improvement Plans are submitted for the second review. Final technical review of the Final Subdivision Map(s) will not conclude until after the Improvement Plans are approved by the ESD.						
Any Building Permits associated with this project will not be issued until, at a minimum, the Improvement Plans are approved by the Engineering and Surveying Division.						
Prior to the County’s final acceptance of the project’s improvements, submit to the Engineering and Surveying Division one copy of the Record Drawings in digital format (on compact disc or other acceptable media) along with one blackline hardcopy (black print on bond paper) and one PDF copy. The digital format is to allow integration						
	to be included in conditions of approval for projects	prior to project construction and during design phase	Project Applicant/ Qualified Engineer/County of Placer, Engineering and Surveying Division	Reviewing Party County of Placer, Engineering and Surveying Division Monitoring Action County to verify incorporation of measure in permit documentation and plans and during inspections required for permits		

Proposed Mitigation Measure(s)	Incorporation into Project	Timing	Implementing Party	Monitoring	Verification of Completion	
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<p>with Placer County’s Geographic Information System (GIS). The final approved blackline hardcopy Record Drawings will be the official document of record.</p> <ul style="list-style-type: none">The Improvement Plans will show all proposed grading, drainage improvements, vegetation and tree removal and all work will conform to provisions of the County Grading Ordinance (Ref. Article 15.48, Placer County Code) and Stormwater Quality Ordinance (Ref. Article 8.28, Placer County Code) that are in effect at the time of submittal. No grading, clearing, or tree disturbance will occur until the Improvement Plans are approved and all temporary construction fencing has been installed and inspected by a member of the Development Review Committee (DRC). All cut/fill slopes will be at a maximum of 2:1 (horizontal: vertical) unless a soils report supports a steeper slope and the ESD concurs with said recommendation. <p>The applicant will revegetate all disturbed areas. Revegetation, undertaken from April 1 to October 1, will include regular watering to ensure adequate growth. A winterization plan will be provided with project Improvement Plans. It is the applicant's responsibility to ensure proper installation and maintenance of erosion control/winterization before, during, and after project construction. Soil stockpiling or borrow areas, will have proper erosion control measures applied for the duration of the construction as specified in the Improvement Plans. Provide for erosion control where roadside drainage is off of the pavement, to the satisfaction of the ESD.</p> <p>The applicant will submit to the ESD a letter of credit or cash deposit in the amount of 110 percent of an approved engineer's estimate using the County’s current Plan Check and Inspection Fee Spreadsheet for winterization and permanent erosion control work prior to Improvement Plan approval to guarantee protection against erosion and improper grading practices. For an improvement plan with a calculated security that exceeds \$100,000, a minimum of \$100,000 will be provided as letter of credit or cash security and the remainder can be bonded. One year after the County's acceptance of improvements as complete, if there are no erosion or runoff issues to be corrected, unused portions of said deposit will be refunded or released, as applicable, to the project applicant or authorized agent.</p> <p>If, at any time during construction, a field review by County personnel indicates a significant deviation from the proposed grading shown on the Improvement Plans, specifically with regard to slope heights, slope ratios, erosion control, winterization, tree disturbance, and/or pad elevations and configurations, the plans will be reviewed by the DRC/ESD for a determination of substantial conformance to the project approvals prior to any further work proceeding. Failure of the DRC/ESD to make a determination of substantial conformance may serve as grounds for the revocation/modification of the project approval by the appropriate hearing body.</p> <p>If project ground disturbance exceeds one acre, prior to any construction commencing, the applicant will provide evidence to the Engineering and Surveying Division of a WDID number generated from the State Regional Water Quality Control Board’s Stormwater Multiple Application & Reports Tracking System (SMARTS). This serves as the Regional Water Quality Control Board approval or permit under the National Pollutant Discharge Elimination System (NPDES) construction storm water quality permit.</p>						
<p>Mitigation Measures GEO-3: Submit Final Geotechnical Engineering Report for Approval</p> <p>The Improvement Plan submittal will include a final geotechnical engineering report produced by a California Registered Civil Engineer or Geotechnical Engineer for Engineering and Surveying Division review and approval. The report will address and make recommendations on the following:</p> <ul style="list-style-type: none">Road, pavement, and parking area design;Structural foundations, including retaining wall design (if applicable);Grading practices;Erosion/winterization;Special problems discovered on-site, (i.e., groundwater, expansive/unstable soils, etc.)Slope stability <p>Once approved by ESD, two copies of the final report will be provided to the ESD and one copy to the Building Services Division for its use. It is the responsibility of the developer to provide for engineering inspection and certification that earthwork has been performed in conformity with recommendations contained in the report.</p> <p>If the geotechnical engineering report indicates the presence of critically expansive or other soil problems that, if not corrected, could lead to structural defects, a certification of completion of the requirements of the soils report will be</p>	to be included in conditions of approval for projects	immediately prior to project construction	Project Applicant/ County of Placer, Engineering and Surveying Division	<p>Reviewing Party</p> <p>County of Placer, Engineering and Surveying Division</p> <p>Monitoring Action</p> <p>Required Preliminary Geotechnical Report submitted to County. Tentative Map shall address the requirements of this measure.</p> <p>Final Geotechnical report shall be reviewed and approved as part of construction and building permit plans.</p>		

Proposed Mitigation Measure(s)	Incorporation into Project	Timing	Implementing Party	Monitoring	Verification of Completion	
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required for subdivisions, prior to issuance of Building Permits. This certification may be completed on a lot-by-lot basis or on a Tract basis. This will be so noted on the Improvement Plans, in the Development Notebook (if required), in the Conditions, Covenants and Restrictions (CC&Rs), and on the Informational Sheet filed with the Final Subdivision Map(s).						
Mitigation Measure GEO-6: Halt Construction Activity, Evaluate Find, and Implement Mitigation for Paleontological Resources In the event that previously unidentified paleontological resources are uncovered during site preparation, excavation, or other construction activity, all such activity within 25 feet of the discovery will cease until the resources have been evaluated by a qualified professional, and specific measures can be implemented to protect these resources in accordance with PRC Sections 21083.2 and 21084.1. If the find is significant, a qualified paleontologist will excavate the find in compliance with state law, keeping project delays to a minimum. Any significant finds will be curated and assessments will be incorporated into the countywide cultural resource database, maintained by the Division of Museums, consistent with General Plan policy. If the qualified paleontologist determines the find is not significant then proper recordation and identification will ensue and the project will continue without delay.	to be included in conditions of approval for projects	during project construction	Project Applicant/ Qualified Paleontologist/County of Placer, Planning Services Division	Reviewing Party County of Placer, Planning Services Division Monitoring Action County shall verify incorporation of measure in permit documentation and plans and review technical report.		
Greenhouse Gas Emissions						
Mitigation Measure GHG-2a: Installation of Electric Vehicle (EV) Charging Stations In accordance with the Placer County Sustainability Plan, project applicants will be encouraged to install EV charging stations at new residential units associated with the proposed project.	to be included in conditions of approval for projects	during project construction	Project Applicant/ County of Placer, Planning Services Division	Reviewing Party County of Placer, Planning Services Division Monitoring Action County to verify incorporation of measure in permit documentation and plans and during inspections required for permits		
Mitigation Measure GHG-2b: Installation of Greywater and Rainwater Catchment Systems In accordance with the Placer County Sustainability Plan, installation of greywater systems, and rainwater catchment systems in new residential construction will be encouraged where feasible.						
Hydrology and Water Quality						
Mitigation Measure WQ-1a: Submit a Drainage Report A Drainage Report will be submitted in final format. The final Drainage Report will be reviewed in concert with the Improvement Plans to confirm conformity between the two. The report will be prepared by a Registered Civil Engineer and will, at a minimum, include: A written text addressing existing conditions, the effects of the proposed improvements, all appropriate calculations, watershed maps, changes in flows and patterns, and proposed on- and off-site improvements and drainage easements to accommodate flows from this project. The report will identify water quality protection features and methods to be used during construction, as well as long-term post-construction water quality measures. The final Drainage Report will be prepared in conformance with the requirements of Section 5 of the Land Development Manual and the Placer County Stormwater Management Manual that are in effect at the time of Improvement Plan submittal.	These requirements are a part of existing regulatory and permitting requirements	at the time of project application and during construction	Project Applicant/ County of Placer, Engineering and Surveying Division	Reviewing Party County of Placer, Engineering and Surveying Division Monitoring Action County to verify incorporation of measure in permit documentation and plans and during inspections required for permits		
Mitigation Measure WQ-1b: Design Water Quality Treatment Facilities/Best Management Practices Water quality treatment facilities/Best Management Practices (BMPs) will be designed according to the guidance of the California Stormwater Quality Association Stormwater Best Management Practice Handbooks for Construction, for New Development / Redevelopment, and for Industrial and Commercial (or other similar source as approved by the Engineering and Surveying Division (ESD)). Storm drainage from on- and off-site impervious surfaces (including roads) will be collected and routed through specially designed catch basins, vegetated swales, vaults, infiltration basins, water quality basins, filters, etc. for entrapment of sediment, debris and oils/greases or other identified pollutants, as approved by the Engineering and Surveying Division (ESD). BMPs will be designed in accordance with the West or East Placer Storm Water Quality Design Manual for sizing of permanent post-construction Best Management Practices for stormwater quality						

Proposed Mitigation Measure(s)	Incorporation into Project	Timing	Implementing Party	Monitoring	Verification of Completion	
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protection. No water quality facility construction will be permitted within any identified wetlands area, floodplain, or right-of-way, except as authorized by project approvals.						
All permanent BMPs will be maintained as required to ensure effectiveness. The applicant will provide for the establishment of vegetation, where specified, by means of proper irrigation. Proof of on-going maintenance, such as contractual evidence, will be provided to ESD upon request. The project owners/permittees will provide maintenance of these facilities and annually report a certification of completed maintenance to the County DPW Stormwater Coordinator, unless, and until, a County Service Area is created and said facilities are accepted by the County for maintenance. Contractual evidence of a monthly parking lot sweeping and vacuuming, and catch basin cleaning program will be provided to the ESD upon request. Failure to do so will be grounds for discretionary permit revocation. Prior to Improvement Plan or Final Map approval, easements will be created and offered for dedication to the County for maintenance and access to these facilities in anticipation of possible County maintenance.						
Mitigation Measure WQ-1c: Protect Storm Drain Inlets						
The project will include the message details, placement, and locations showing that all storm drain inlets and catch basins within the project area will be permanently marked/embossed with prohibitive language such as “No Dumping! Flows to Creek.” or other language /graphical icons to discourage illegal dumping as approved by the Engineering and Surveying Division (ESD). ESD-approved signs and prohibitive language and/or graphical icons, which prohibit illegal dumping, will be posted at public access points along channels and creeks within the project area. The Homeowners’ / Property Owners’ association and/or Property Owner is responsible for maintaining the legibility of stamped messages and signs.						
Mitigation Measure WQ-1d: Compliance with National Pollutant Discharge Elimination System Requirements						
For projects within the East or West Phase II Permit Area, the following mitigation measure applies. If a project is located within the permit area covered by Placer County’s Small Municipal Separate Storm Sewer System (MS4) Permit (State Water Resources Control Board National Pollutant Discharge Elimination System (NPDES)), project-related storm water discharges are subject to all applicable requirements of said permit.						
The project will implement permanent and operational source control measures as applicable. Source control measures will be designed for pollutant generating activities or sources consistent with recommendations from the California Stormwater Quality Association (CASQA) Stormwater BMP Handbook for New Development and Redevelopment, or equivalent manual, and will be shown on the Improvement Plans.						
The project is also required to implement Low Impact Development (LID) standards designed to reduce runoff, treat storm water, and provide baseline hydromodification management as outlined in the West OR East Placer Storm Water Quality Design Manual.						
Mitigation Measure WQ-1e: Compliance with Placer County Stormwater Quality Ordinance						
For projects outside the Phase II Permit Area, the following mitigation measure applies. The Improvement Plans will include BMPs designed to ensure that pollutants contained in project-related storm water discharges are reduced to the maximum extent practicable and that non-storm water discharges are prevented from leaving the site, both during and after construction, as required by Placer County’s Stormwater Quality Ordinance (Placer County Code, Article 8.28).						
Mitigation Measure WQ-1f: Storm Water Quality Report						
For projects within East or West Phase II Permit Area, the following mitigation measure applies. Per the State of California NPDES Phase II MS4 Permit, this project is a Regulated Project that creates and/or replaces 5,000 square feet or more of impervious surface. A final Storm Water Quality Plan (SWQP) will be submitted, either within the final Drainage Report or as a separate document that identifies how this project will meet the Phase II MS4 permit obligations. Site design measures, source control measures, and Low Impact Development (LID) standards, as necessary, will be incorporated into the design and shown on the Improvement Plans. In addition, per the Phase II						

Proposed Mitigation Measure(s)	Incorporation into Project	Timing	Implementing Party	Monitoring	Verification of Completion	
					Date	Initial
MS4 permit, projects creating and/or replacing one acre or more of impervious surface (excepting projects that do not increase impervious surface area over the pre-project condition) are also required to demonstrate hydromodification management of storm water such that post-project runoff is maintained to equal or below pre-project flow rates for the 2 year, 24-hour storm event, generally by way of infiltration, rooftop and impervious area disconnection, bioretention, and other LID measures that result in post-project flows that mimic pre-project conditions.						
Mitigation Measures WQ-3a: Storm Water Requirements in Improvement Plan The Improvement Plan submittal and final Drainage Report will provide details showing that storm water run-off peak flows and volumes will be reduced to at least pre-project conditions through the installation of detention/retention facilities. Detention/retention facilities will be designed in accordance with the requirements of the Placer County Stormwater Management Manual or other regulatory document that are in effect at the time of submittal, and to the satisfaction of the Engineering and Surveying Division (ESD) and will be shown on the Improvement Plans. The ESD may, after review of the project’s final Drainage Report, delete this requirement if it is determined that drainage conditions do not warrant installation of this type of facility. Maintenance of detention/retention facilities by the homeowner’s association, property owner’s association, property owner, or entity responsible for project maintenance will be required. No detention/retention facility construction will be permitted within any identified wetlands area, floodplain, or right-of-way, except as authorized by project approvals.	These requirements are a part of existing regulatory and permitting requirements	At the time of project application and during construction	Project Applicant/ County of Placer, Engineering and Surveying Division	Reviewing Party County of Placer, Engineering and Surveying Division Monitoring Action County to verify incorporation of measure in permit documentation and plans and during inspections required for permits		
Mitigation Measure WQ-3b: Flood Plain Requirements On the Improvement Plans and Informational Sheet(s) filed with a Final Map(s), show the limits of the future, unmitigated, fully developed, 100-year flood plain (after grading) for any drainageway with a tributary area of 20 acres or more and designate same as a building setback line unless greater setbacks are required by other conditions contained herein.						
Mitigation Measure WQ-3c: Building Elevation Reporting Requirements On the Improvement Plans and Informational Sheet(s) filed with a Final Map(s), show that finished house pad elevations will be a minimum of two feet above the 100-year flood plain line (or finished floor -three feet above the 100-year floodplain line). The final pad elevation will be certified by a California registered civil engineer or licensed land surveyor and submitted to the Engineering and Surveying Division. This certification will be done prior to construction of the foundation or at the completion of final grading, whichever comes first. No building construction is allowed until the certification has been received by the Engineering and Surveying Division and approved by the floodplain manager. Benchmark elevation and location will be shown on the Improvement Plans and Informational Sheet (s) to the satisfaction of Development Review Committee.						